# Regulating the Electricity transition

# **L**

### Insights from the UK and its Electricity Market Reform

#### **Michael Grubb**

Professor of Energy and Climate Change,

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Chair, UK Panel of Technical Experts on Electricity Market Reform

Former Senior Advisor, Sustainable Energy Policy / Improving Regulation, OfGEM (2011-2016)

- Evolution of UK electricity overview
- A brief word on retail markets
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Presentation to Centre for Energy Regulation Visiting delegation of Indian electricity regulators and experts London, 19<sup>th</sup> Oct 2019



.. moved through a 'sea of gas', coal now exiting with rapidly rising renewables

national Capacity Building (ICB)"Learning from

An "island of coal in a sea of oil and gas" no longer



Subsueqent academic paper in The Energy Journal

UK electricity policy & regulatory Experiences and Market Development in Europe"

	Policy environment	Regulatory remit
1990s	<ul> <li>First liberalisation</li> <li>Competition through electricity pool</li> <li>System marginal price + cap<sup>y</sup> payment</li> <li>⇒ "Dash for gas", based on Long term contracts (Purchasing Power Agreements) with distribution companies</li> <li>⇒ Collapse of R&amp;D</li> <li>Some contract support for renewables</li> </ul>	<i>"Promote competition"</i> Retail liberalisation Concerns about oligopolistic power in wholesale markets
2000s	<ul> <li>Bilateral trading market (NETA/BETTA)</li> <li>replace pool, energy-only market</li> <li>⇒ Vertical integration of generators with supply companies;</li> <li>⇒ Limited investment</li> <li>Market certificate trading (ROCs) support for renewables</li> </ul>	"Protect interests of consumers" Growing concerns about lack of investment or new entry, transmission connection & bottlenecks, and short-termism and rising prices and fuel poverty
2010s	Electricity Market Reform (EMR) + Climate Change Act	"Protect interests of present and future consumers"

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# Retail markets – 'Sticky customers'

#### - concern that many customers don't take advantage of competition

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# Retail market products and innovation

# 

#### – concerns over prices and competition





Homogeneous
 commodity/quasi
 -commodity

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- Main innovation in contract packages, not product
- 'Confusopoly'
- No evolution to energy services market

## [How] is energy different?



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Characteristics of electricity and gas as products make them strongly prone to "First Domain" decision-making behaviour (dominated by non-economic factors / non-optimising behaviour) with low rates of innovation

#### No product differentiation

All electrons (or all methane): no physically distinct products to drive consumer engagement

#### Incidental not deliberative consumption

 Not a conscious choice: implicit in other decisions with cost usually invisible (or trivial) at point of use

#### No substitutes

 For the vast majority of uses there are no reasonable substitutes to electrons or methane: cannot buy something different instead

#### Continuous

 No discrete point at which consumers "need to go and buy a new one" and hence focus on decision

#### Essential

 impractical to force a decision (eg. "choose or be disconnected") unlike many financial or insurance products with natural expiry terms.



#### => Disengaged consumers may be natural state of electricity or gas system

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Context for the Labour years, 1997-2010

- Neo-liberal consensus
  - Competition
    - From duopoly to breakup
    - From pool to bilateral trading
  - Environment
    - Carbon pricing (Climate Change Levy, EU ETS)
    - .. Move towards more diversified technology incentives
  - Implementation supports
    - Carbon Trust, Energy Savings Trust, supplier obligations
- Rise of investment worries, regulatory tensions and popular concern over rising prices and vulnerable customers

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- Landmark 2008 legislations
  - Energy Act inc Ofgem "present and future consumers"
  - Climate Change Act
- Electricity questions take centre stage

# Background

### "Its complicated ..."

- 'Pioneer of liberalisation' concluded it could not deliver the capital investment needed for security or decarbonisation
- Nuclear & renewables seen as key
- Intellectual evolution:
  - Academic struggles between idealised theory and emerging evidence
  - CCC (2008) concern around inadequate capital intensive investment
  - Ofgem (Project Discovery, 2009) concern around security adequacy





# Growing emphasis on need for stable investment environment in aftermath of financial crisis

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Regulatory Experiences and Market Development in Europe

Relative decline of gross capital formation in the EU



Source: Spencer T, O. Sartor et al, "What is Needed in the EU's 2030 Climate and Energy Framework?" *Climate Strategies* working paper, forthcoming 30 Sept 14

See also House of Lords, EU Subcommittee D report, 2013: 'No country is an energy island: securing investment for the EU's future' .. Influenced by industry demand for clarity & Stability

#### Including power sector analysis of costs of delay

#### Eurelectric's Power Choices Reloaded – high cost of a Lost Decade

Power Choices Reloaded's *Lost Decade* modelling scenario assumes a complete lack of action in the decade 2020-2030, therefore the entire decarbonisation action has to occur in the last two decades to 2050

Infrastructure, power sector decarbonisation, mobility electrification and technology R&D, as well as energy efficiency in the demand side sectors will have to develop in a very short period of time post-2030

The changes required in the system from 2030 to obtain the necessary cumulative emissions reductions by 2050 result in this scenario being barely feasible in true life

#### Key failures involved in the Lost Decade case

- Weak carbon market until 2030
- Limited financing under uncertainty hampering investment
- Market coordination failures delaying infrastructure
- Non-completion of IEM leading to low cross-border energy trade
- Slower pace of technology progress: learning curves and build up of supply chains
- Delays to energy efficiency persisting up to 2030, especially on the demandside and in electrification



## UK Electricity Market Reform (EMR)

## Four instruments

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... with significant challenges in overall institutional design.

# **UCL**

# Some Key debates

- Can shifting risk to government reduce costs? Yes if
  - the risks arise from private perception of policy risk;
  - markets (particularly capital markets) are myopic
  - the benefits are partly public (eg. Due to inadequate environmental pricing, or innovation / learning spillovers, etc)
- Do we need a Capacity Mechanism in addition to low carbon supports?
  - Yes in UK context but design is crucial to minimise risk of perverse incentives
- Institutional complexities
  - contracting bodies and their governance
- Terms and constraints for long term contracts
  - Hinkley Point (35yr) vs renewables (15 yrs)
  - State Aid struggles
- Risks to market?
  - More State involvement
  - Some risks of perverse incentives remain (eg. Metered output)

# UK Electricity Market Reform (EMR)

#### 

### **Contracts for Difference**



Benefits and lessons for UK Offshore wind

Drawing also on the *EnergieWende*, the UK has been able to engineer our own dramatic transformation of a huge renewable resource

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Sources: M.Grubb and D.Newbery (2018), 'UK Electricity Market Reform and the Energy Transition: Emerging Lessons', MIT-CEEPR working paper; Grubb & Drummond (2018), UK Industrial Elec Prices

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### Capacity Market

Why	<ul> <li>Ensure market can deliver security of supply</li> <li>Stable revenues to encourage investment</li> </ul>
How	<ul> <li>•Market wide auction of capacity obligations, run by National Grid</li> <li>•Successful bidders get stable revenue at clearing price</li> <li>•Obligated to deliver capacity when needed or face penalties</li> <li>•Technology neutral – but those receiving CfDs are not eligible</li> <li>•Pilot scheme to help Demand-side response transition into the CM</li> </ul>
Effect	<ul> <li>✓ Insurance against blackouts</li> <li>✓ Reduces price volatility</li> <li>? Less peaky prices – impacts on other investments (eg. DSR)</li> <li>? Need independent procedures for establishing 'derating factors' - complex</li> </ul>

### Capacity: be careful what you ask for ...



# Fixed, system-wide auctioned payments for firm capacity Lots of bids, low prices, new options, lots of angst





#### First main capacity auction (Dec 2014)

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Almost 50GW awarded, clearing price **19.40**/kW/year\* Mix of 1-year, 3-year (refurbishment) and 15 year (2.5GW of new build out of 10GW bid) contracts Mainly existing nuclear, gas and coal generators One new big gas plant wins agreement – but cancelled V. Little demand side response

#### Second main capacity auction (Dec 2015)

Clearing price £**18.00**/kW/year 46.35GW awarded – new options replace retiring coal Interconnectors, 1GW of small reciprocating engine Concern about diesel

#### Third main capacity auction (Dec 2016)

Clearing price £**22.50**/kW/year 52.43GW awarded, inc 3.4 GW new capacity – over 500MW batteries New diesel largely excluded, but wider concern about 'embedded benefit' exemptions from transmission

Jan 2018: Reformed system yields even lower price - £8/kW/yr

# Assessing previous auctions: observations

#### Increasing role of government

- Does not necessarily imply reduced role of competition
- May give competition *direction*, create 'new markets'

#### Giving competition direction / 'new markets'

- May increase pace and/or scale of competition
- Challenges incumbency and likely to reveal new options

#### Be careful what you ask for .....

- Not all new options will be welcomed
- May crowd out what you thought you wanted (but might change your mind..)

#### Our language and metrics are inadequate

- Are these 'interventions' or 'markets' or what?
- What is a subsidy (and how do we measure it)?
- What is 'baseload', what is 'backup', what is 'reserve margin'?
- Are EMR instruments the long term solution? Indeed, is that a chimera?
- What is the evolution ... ?

## + Carbon floor price impacts coal

Dramatic (80%) fall since 2012: first days without coal power for over a Century UK point of the Driven as declining gas price meets rising carbon price, and renewables falls 2012-15 offset by rising renewables; increased gas in 2016



UK power sector CO<sub>2</sub> *halved* since 1990, coal now below 10% of generation.

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C price drives *operation and closure,* less new investment or efficiency. Impact since 2014 much bigger than before due to price+ **and** :

- Lower gas coal price differential
- energy efficiency policies, demand declining since c.
   2010
- Rapidly rising share of renewables

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# Future Challenges

st International Capacity Building (ICB)"Learning from sulatory Experiences and Market Development in Europe

- Impact of sporadically unstable gas prices
- Politicisation of the energy debate
- Nationalism vs Europeanisation of UK energy system and the accounting of Interconnectors
- Popular opposition to onshore wind driving up energy costs
- Interactions between capacity mechanism and CfDs
- The impracticality of a rising UK-only carbon price floor fuels doubt over the 'post-EMR' landing
- Politicisation of the European debate and doubts about political will for meaningful 2030 consensus
- What is an efficient system with renewables and Intermittency ...?

# Priorities for UK 'post ...' (1)

1st International Capacity Building (ICB)"Learning from Regulatory Experiences and Market Development in Europe'

## A strategy for changing 'load duration' & 'system costs'



# The cost of 'backup' in itself is modest

The capital cost even of new backup capacity adds maybe 10% (annuitized capital cost)

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- Fixed O&M includes insurance, connection and use of system charges.
- The figure assumes new backup capacity is required equal to the annual average output of the wind energy, which is a plausible indication of the optimal level.
- Costs are annuitized at 5% ARR; USD to GBP exchange rate = 0.75
- Offshore wind, onshore wind and CCGT values from DECC 2013 cost of generation publication, 2016 projected values. For reciprocating diesel engine, data from Lazard Version 9

Source: Grubb, Smith and Drummond (2016), UCL submission to House of Lords Enquiry into the Economics of UK Energy Policy: UCL EI/ISR, October 2016

# Priorities for UK 'post ...' (2)



- EMR renewables: trim the sails before rocking the boat
- CfD auctions for renewables reinstate the cheapest
- ... whilst articulating system costs and time-dependent options

*EMR – capacity market .....* 5-year review: reform, or reboot? Need to focus **on the D's not the C's:** 

- Decentralised generation
- Demand-side resources & differentiation
- Dynamics
- ... and DATA

Distributed service providers (DSP/Os?)

#### Post-Brexit ...

- Too early: could UK stay in a pan-European Energy Union ?
- ? Including Single Electricity Market ?
- Direct cross-border contracting?



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#### 2008 UK Climate Change Act

- UK commitment to 80% reductions GHG emissions by 2050 (from 1990)





\* bunker fuels basis



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# CCC Report (Dec 2008) placed decarbonisation of electricity at the centre of the intermediate and long-term strategy





The strategy requires radical decarbonisation of power sector followed by expansion of electricity to transport and maybe heating sectors

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Regulatory Experiences and Market Development in Europe

Electricity CO<sub>2</sub> emissions intensity to 2050





... which would also bring short-term storage with the added demand



- May evolve multiple markets with managed competition between them?

EMR is a step forward but far from the whole journey

