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Why we like the EU ETS

Flexibility and transparency make it the instrument of choice

Vis-à-vis its *Command* & *Control alternatives, the EU ETS provides:*

- Environmental Transparency There is a cap, the number is clear
- Technological Flexibility The flexibility to choose how
- Temporal Flexibility The flexibility to choose when
- Environmental Efficiency A clear value minimizing costs vis-à-vis its alternatives per environmental benefit
- Harmonization It ensures a level playing field

ETS is leading climate policy worldwide Major players have gone or are going ETS







Economic efficiency at risk

Competing C&C* instruments will lead to higher costs





Source: EU Commission 2014, Impact Assessment of the 2014 Energy Efficiency Communication

Note: (*) Command and Control. The Energy efficiency scenarios foreseen mainly C&C instruments such as Ecodesign standards and CO2 standards in transport

EE targets assume constant 40% GHG target and 27% RES target



Harmonization at risk

National Carbon Taxes are gaining ground



- Carbon taxes are proliferating in Europe and in some cases the are/could overlap with the ETS (e.g. UK, It, Fr)
- Against common wisdom, carbon taxes..
 - are NOT stable as deemed (ex. UK carbon price floor)
 - are MORE expensive for industry being NOT aligned to economic cycles
 - do NOT ensure the climate outcome
 - HIGH risk of fragmentation and market distortion at EU level (Council unanimity required)
- An EU wide carbon tax or border adjustment tax is highly unlikely

Carbon taxes around the world and the estimated share of GHG emissions covered in their jurisdiction



Tackling excess auction supply

The matter's urgency requires strengthening the MSR





Source: Argus, 2015; Enel Group internal Analysis

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Safeguarding EU competitiveness





- Current carbon leakage rules calibrated on 30 €/t could safeguard competitiveness for at least another decade
- A clear political commitment exist to ensure that also in the future EU competitiveness is not undermined



A strong commitment for the future

Council Conclusions on the 2030 Climate Energy framework clearly state:

- "Existing measures will continue after 2020 to prevent the risk of carbon leakage"
- "Both direct and indirect carbon costs will be taken into account"

Conclusions



- The ETS revision is heading in the right direction:
 - Ambition consistent with the global context
 - Clear commitment to safeguard competitiveness
 - ✓ MSR ensuring a central role for the EU ETS
- The MSR proposal should be strengthened by:
 - Transfer of Back-loaded volumes in the Reserve
 - Early implementation in 2017
 - Stronger monitoring and review
- Market dynamics will complement the MSR ensuring stable price dynamics outside the natural speculative market volatility
- Fundamentals will be affected by a number of factors including hedging needs, abatement opportunities, planning horizons