

Attachment B: Examples

Auction Notice California Cap-and-Trade Program and Québec Cap-and-Trade System Joint Auction of Greenhouse Gas Allowances

This document (Attachment B) provides information on auction bidding limitations and the settlement price determination process, and provides examples of how to determine the amount of a bid guarantee, how holding and purchase limits are applied, how United States (U.S.) and Canadian currencies are handled, and examples of how joint auctions are settled. This document is guidance only and does not supersede the California Cap-and-Trade Regulation (California Regulation) or the Québec Regulation respecting a cap-and-trade system for greenhouse gas emission allowances (Québec Regulation). In circumstances of uncertainty, the California and Québec Regulations are the controlling documents.

Entities registered under the Québec Cap-and-Trade System (QC entities) may participate in joint auctions in either United States Dollars (USD) or Canadian Dollars (CAD). Joint auction bid evaluations and settlement price determination will be conducted in USD. The value of all bid guarantees and bid prices submitted in CAD will be converted into USD in whole cents using the established Auction Exchange Rate to conduct the auction in a single currency, including the evaluation of bids on a common basis. All bid assessments, the settlement price, and the cost of all allowances awarded will be determined in USD. For any QC entity participating in CAD, the total cost of allowances is first determined in USD (USD settlement price multiplied by number of allowances awarded) and then converted to a CAD value based on the Auction Exchange Rate¹ so the entity can complete financial settlement in CAD.

For entities bidding in CAD, an example of how to determine a bid guarantee in CAD is provided in this attachment and illustrated in Table 1a. Example 9 includes a description of how the CAD amount due for allowances awarded is calculated for QC entities participating in CAD. All other examples throughout this document assume bids are submitted in USD.

¹ To manage multiple currencies, an Auction Exchange Rate is determined prior to each joint auction.

I. Determining an Entity's Bid Guarantee

Table 1 presents hypothetical bid submissions for an auction in which seven entities are participating. In the following examples, it is assumed that each of the participants is only bidding in the Current Auction and all bids are submitted in USD. Considerations for participation in the Advance Auction are included at the end of this attachment. Each row in Table 1 provides the bid value at each bid price. The Auction Administrator will accept bids for lots of allowances; each bid lot represents 1,000 allowances.

Table 1: Maximum Bid Value of Bidder's USD Bids

Entity Name	Bid Price	Bid Lots	Bid Number of Allowances	Entity Cumulative Allowances	Bid Value at Each Bid Price
A	\$22.69	40	40,000	40,000	\$907,600
A	\$18.45	55	55,000	95,000	\$1,752,750
A	\$15.43	70	70,000	165,000	\$2,545,950
A	\$12.40	85	85,000	250,000	\$3,100,000
B	\$17.79	80	80,000	80,000	\$1,423,200
B	\$12.12	170	170,000	250,000	\$3,030,000
C	\$43.05	25	25,000	25,000	\$1,076,250
C	\$38.95	50	50,000	75,000	\$2,921,250
C	\$36.91	90	90,000	165,000	\$6,090,150
D	\$21.54	50	50,000	50,000	\$1,077,000
D	\$18.39	120	120,000	170,000	\$3,126,300
E	\$19.72	35	35,000	35,000	\$690,200
E	\$17.55	50	50,000	85,000	\$1,491,750
E	\$15.43	70	70,000	155,000	\$2,391,650
E	\$12.10	110	110,000	265,000	\$3,206,500
F	\$12.10	200	200,000	200,000	\$2,420,000
G	\$19.72	50	50,000	50,000	\$986,000
G	\$18.39	120	120,000	170,000	\$3,126,300

Table 1 Terminology

Bid Number of Allowances = Bid Lots * 1,000

Cumulative Allowances = Sum of current Bid Number of Allowances and Bid Number of Allowances at each higher Bid Price

Bid Value = Cumulative Allowances * Bid Price

When bidding in an auction, the bid currency, bid price, number of bid lots, and instrument vintage are entered for each bid. When placing bids for the Current Auction, the vintage selection is “Current.” The Current Auction may include allowances from the current and previous budget years. These allowances can include allowances that have been made available for auction from closed Compliance Instrument Tracking System Service accounts, allowances submitted for untimely surrender obligations, allowances returned as the result of an enforcement settlement, and allowances from previous budget years which were offered but not sold at previous auctions held by California or Québec. In the event that the Current Auction contains multiple vintage years, bids cannot be placed for a particular vintage, bids are submitted as “Current” vintage. The vintage to be selected when placing bids in the Advance Auction is the year of the allowances offered in the Advance Auction (in 2015, vintage 2018 allowances are offered for Advance Auction and the vintage selection is 2018).

For CA entities, the bid currency will be selected as USD. For QC entities, the bid currency will be entered as USD or CAD, based on the currency selection made during the auction application or confirmation of intent to bid process. The cumulative allowances shown in Table 1 are not entered or shown in the bid schedule, but are shown here for illustrative purposes. The “Entity Cumulative Allowances” column indicates the total allowances the entity has submitted bids to purchase at that bid price and all higher bid prices.

To determine the value of your total bid guarantee when there are multiple bids at different bid prices, the following process would apply:

Example 1: Calculating a Bid Guarantee When Submitting Multiple Bids in USD

As shown in Table 1, Entity A has submitted four different bids at four different USD bid prices.

- Bid price of \$22.69: Entity A bid for 40,000 allowances at a cost of \$907,600.
- Bid price of \$18.45: Entity A bid for 95,000 allowances at a cost of \$1,752,750. (95,000 allowances is the sum of 40,000 plus 55,000.)
- Bid price of \$15.43: Entity A bid for 165,000 allowances at a cost of \$2,545,950. (165,000 allowances is the sum of 40,000 plus 55,000 plus 70,000)
- Bid price of \$12.40: Entity A bid for 250,000 allowances at a cost of \$3,100,000. (250,000 allowances is the sum of 40,000 plus 55,000 plus 70,000 plus 85,000)

Entity A's bid schedule shows that it is willing to purchase a total of 250,000 allowances at a price of \$12.40 at a maximum bid value of \$3,100,000. **Entity A should submit a bid guarantee of at least \$3,100,000 if it wants to buy all the allowances in its bid schedule.**

Using the same evaluation process for the bid schedules submitted by Entities B to G, the maximum total value of each entity's bid schedule is determined, shown above in Table 1, highlighted in grey.

Based on this example, each entity's bid guarantee should be equal to or greater than the maximum total value for the planned bid schedule in Table 1. Entities bidding in an auction will be limited to incurring a total cost less than or equal to the dollar amount of the bid guarantee submitted and should evaluate their bids against the bid guarantee they provided in the manner illustrated in this example. The California Regulation requires bid guarantees to be greater than or equal to the maximum value of the bids to be submitted.

Assuming bids are submitted in USD, the minimum bid guarantee Bidders A to G should submit to avoid having their bid(s) rejected in lots of 1,000 allowances by the Auction Administrator would be as follows:

- Bidder A – \$3,100,000
- Bidder B – \$3,030,000
- Bidder C – \$6,090,150
- Bidder D – \$3,126,300
- Bidder E – \$3,206,500
- Bidder F - \$2,420,000
- Bidder G - \$3,126,300

Example 2: Calculating a Bid Guarantee When Submitting Multiple Bids in CAD

Example 1 above assumes an entity submitted bids in USD. A QC entity has the option of participating in a joint auction in USD or CAD, and must submit bids in the currency chosen in the auction application or confirmation of intent to bid. The value of all bids and bid guarantees submitted in CAD will be converted into USD in whole cents using the established Auction Exchange Rate to conduct the auction in a single currency, including the evaluation of bids on a common basis. A QC entity participating in CAD should consider the effect of a change in the exchange rate between the day the bid guarantee is submitted and the Auction Exchange Rate in

effect for a joint auction when determining the amount of the bid guarantee. The USD value of a bid guarantee submitted in CAD will change as a result of a change in the exchange rate from the time the bid guarantee is submitted to the Auction Exchange Rate in effect for a joint auction.

Table 1a is a variation of Table 1 that presents the same bid schedule previously described for Entity A, except the bid currency is CAD and for this example the USD to CAD Auction Exchange Rate is 1.1000. For the first bid in the table below, the bid price of \$24.96 CAD converts to \$22.69 USD ($\$24.96 / 1.1000 = \22.69).

For the purpose of this attachment and all examples, the Auction Exchange Rate is 1.1000 (USD to CAD) and the Auction Reserve Price for both the Current and Advance Auction is \$12.10 USD / \$13.31 CAD per allowance.

Table 1a: Maximum Bid Value of Bidder A's CAD Bids

Entity Name	Bid Price (CAD)	Bid Price Value (USD)	Bid Lots	Bid Number of Allowances	Cumulative Allowances	Bid Value at Each Bid Price (USD)	Bid Value at Each Bid Price (CAD) ²
A	\$24.96	\$22.69	40	40,000	40,000	\$907,600	\$998,360
A	\$20.30	\$18.45	55	55,000	95,000	\$1,752,750	\$1,928,025
A	\$16.97	\$15.43	70	70,000	165,000	\$2,545,950	\$2,800,545
A	\$13.64	\$12.40	85	85,000	250,000	\$3,100,000	\$3,410,000

The Québec Regulation requires that the maximum amount of an entity's bids must not exceed the amount of the bid guarantee submitted. If Entity A is participating in CAD, and assuming an Auction Exchange Rate of 1.1000 (USD to CAD), the minimum bid guarantee Entity A should submit to avoid having its bids limited by the Auction Administrator would be as follows:

Entity A – maximum value of bids submitted is \$3,410,000 CAD and thus, this is the minimum amount that Entity A should submit to avoid having its bid(s) rejected in lots of 1,000 allowances by the Auction Administrator. With an Auction Exchange Rate of 1.1000 USD to CAD, \$3,410,000 CAD is equal to \$3,100,000 USD, which is the bid guarantee amount that will be used in the Auction Platform.

² The CAD value at each bid price is calculated using the following formula: Cumulative Total Allowances Bid * USD Bid Price * Exchange Rate (1.1000).

II. Bid Guarantees for Current and Advance Auctions

Bidders submit a single bid guarantee for both the Current Auction and Advance Auction. Once the Current Auction settlement price has been determined, the entity's total cost for allowances awarded in the Current Auction (USD settlement price multiplied by number of allowances awarded) will be determined and deducted from the bid guarantee amount, and any bid guarantee amount remaining will be applied to the Advance Auction. The bid guarantee is applied to the Current Auction then Advance Auction in the form of USD currency, regardless of the currency selected by the bidder.

Example 3: Application of a Single Bid Guarantee to Current and Advance Auction

If Entity A in Table 1 submitted a bid guarantee of \$10,000,000 USD and the auction settlement price for the Current Auction is \$15.43 USD, then the cost of allowances awarded in the Current Auction is \$2,545,950.

The remaining bid guarantee amount of \$7,454,050 USD would be available to be applied to bids submitted for the Advance Auction.

$$165,000 \text{ allowances} * \$15.43 = \$2,545,950 \text{ USD}$$

$$\$10,000,000 - \$2,545,950 = \$7,454,050 \text{ USD}$$

For QC entities that have selected to participate in CAD, the value of all bids and bid guarantees submitted in CAD will be converted into USD in whole cents using the established Auction Exchange Rate. If Entity A in Table 1a submitted a bid guarantee of \$10,000,000 CAD, the USD value would be \$9,090,909 (\$10,000,000 / 1.1000). If the auction settlement price for the Current Auction is \$15.43 USD, the cost of allowances awarded would again be \$2,545,950 USD (165,000 allowances * \$15.43), and the remaining bid guarantee amount available for the Advance Auction would be \$6,544,959 USD.

$$\$9,090,909 \text{ (USD)} - \$2,545,950 \text{ (USD)} = \$6,544,959 \text{ (USD)}$$

III. Entity Bid Evaluation Procedures for Purchase Limits and Holding Limits

Example 4 and Example 5 illustrate how bidders should evaluate their Current Auction bid schedules for the purchase limit and holding limits.

A. Purchase Limits

The purchase limits that apply to one entity or a group of entities with a direct corporate association for the Current Auction and separately to the Advance Auction are as follows:

For CA entities:

- The purchase limit for covered entities and opt-in covered entities, including electrical distribution utilities, will be twenty five (25) percent of the allowances offered for auction; and
- The purchase limit for general market participants is four (4) percent of the allowances offered for auction.

For QC entities:

- The purchase limit for emitters is twenty five (25) percent of the allowances offered for auction; and
- The purchase limit for Participants is four (4) percent of the allowances offered for auction.

The purchase limit percentages apply to the number of allowances offered for sale in the Current Auction and separately to the number of allowances offered for sale in the Advance Auction as presented in the Auction Notice.

Example 4: Determining an Entity's Current Auction Purchase Limit

For each category of entity, multiply the purchase limit percentage for the entity category by the total amount of allowances available for auction. The purchase limit is determined separately for the Current Auction and the Advance Auction. The Current Auction purchase limit for an entity that is a CA covered entity or a QC emitter is calculated as:

Allowances offered for sale in the Current Auction = 1,000,000 allowances
Current Auction purchase limit percentage = 25 percent

Purchase limit = 1,000,000 * 0.25
Purchase limit = 250,000 allowances

B. Holding Limits

Holding limits apply to all entities across all linked jurisdictions and are based on the following formula:

Holding Limit = 0.1 * Base + 0.025 * (Annual Allowance Budget – Base)

Where:

“Base” equals 25 million metric tons of carbon dioxide equivalent (CO₂e).

“Annual Allowance Budget” is the number of allowances issued for the current budget year.³

For 2015, the annual budget in California and Québec is 459,800,000 allowances.

Holding Limit = $0.1 * 25,000,000 + 0.025 * (459,800,000 - 25,000,000)$

2015 Holding Limit = 13,370,000 allowances

C. Maximum Number of Allowances an Entity Can Hold

The holding limit is the maximum number of allowances an entity may hold or the maximum number of allowances that may be jointly held by a group of entities with a direct corporate association.

Allowances purchased in the Current Auction are subject to the current vintage holding limit detailed in section 95920(c)(1) of the California Regulation and Article 32 of the Québec Regulation. The current vintage holding limit applies to allowances from the current calendar year, previous calendar years, and allowances purchased from the Allowance Price Containment Reserve and the Minister’s reserve account.

There is a separate holding limit for each calendar year of allowances with a vintage year beyond the current calendar year. For the Advance Auction, allowances purchased in the Advance Auction are subject to the holding limit for the vintage year of the allowances sold at that Advance Auction pursuant to section 95920(c)(2) of the California Regulation and Article 32 of the Québec Regulation.

A covered entity or emitter may exempt a limited number of allowances from the current vintage holding limit by transferring them to its compliance account. This “limited exemption” is described in section 95920(d)(2) of the California Regulation and Article 32 of the Québec Regulation. The limited exemption is based on an entity’s emissions, and is designed to allow covered entities the ability to accumulate the allowances they need for compliance. For that reason, the limited exemption is increased each year by the amount of the entity’s emissions contained in the most recent verified emissions data report. The limited exemption is decreased at the end of the year following the close of a compliance period, after the entity has completed its surrender obligation for the compliance period.

³ The annual allowance budget in a linked program includes allowances issued by participating jurisdictions.

Entities can calculate the maximum number of allowances they can hold using the following example (Example 5) and using the holding limit values from Table 2.

Example 5: Determining the Maximum Number of Allowances an Entity Can Hold and Purchase to Comply with the Holding Limit

The maximum number of allowances an entity can hold at one time equals the holding limit plus the limited exemption. The limited exemption is the number of allowances that are exempt from the holding limit calculation if held by an entity in its compliance account. Assuming an entity takes full advantage of the limited exemption, in 2015 the maximum number of allowances that may be held is calculated as:

$$\text{Maximum Number of Allowances Held} = 13,370,000 + \text{Limited Exemption}$$

When submitting bids in an auction, an entity may not exceed the applicable holding limits. Suppose an entity's limited exemption is equal to 4,000,000 metric tons and it holds 1,000,000 allowances in its compliance account and an additional 2,000,000 vintage 2015 or prior allowances in its general holding account; in this case, the maximum number of allowances the entity can hold and stay within the holding limit is:

$$\begin{aligned} \text{Maximum Number of Allowances Held} = \\ 13,370,000 + 4,000,000 - 1,000,000 - 2,000,000 = 14,370,000 \text{ allowances.} \end{aligned}$$

Entities can hold more allowances in their compliance account than allowed under the limited exemption, but any allowances in excess of the limited exemption will count towards the holding limit. If the entity in the prior example had a compliance account balance of 4,500,000 allowances, the following represents the allowances which may be purchased without exceeding the holding limit:

$$\begin{aligned} \text{Maximum Number of Allowances Held} = \\ 13,370,000 + 4,000,000 - 4,500,000 - 2,000,000 = 10,870,000. \end{aligned}$$

Although the California Regulation allows the Executive Officer to transfer allowances awarded in an auction to an entity's general holding account or its compliance account as needed to facilitate compliance with the holding limit, the entity should ensure it makes all necessary transfers itself. In Example 5, for a CA entity with a limited exemption of 4,000,000 and 1,000,000 allowances in its compliance account, 3,000,000 allowances purchased at auction would be transferred directly into the entity's general holding account and the entity would need to ensure that transfers were made as necessary to its compliance account to ensure compliance with the holding limit.

Per the Québec Regulation, Québec will not deposit allowances directly into an emitter's compliance account. Therefore, any QC entity purchasing allowances that would bring its total beyond its holding limit will have to transfer any allowances in excess of the holding limit into its compliance account. It will be each entity's responsibility to complete any necessary transfer of allowances within five (5) days of allowance distribution to conform to the holding limit as indicated in the Article 32 of Québec Regulation.

In Example 5, a QC entity purchasing allowances at auction that would exceed the current vintage holding limit will have to transfer the excess allowances into its compliance account. It is the entity's responsibility to transfer sufficient allowances within five (5) days of the distribution of allowances to conform to the holding limit as indicated in the Article 32 of Québec Regulation. If allowances exceeding the holding limit remain in the general holding account five (5) days after the auction allowance distribution, the excess allowances will be removed and put back in the Auction Account of the Minister to be sold in a subsequent auction.

IV. Auction Administrator Application of the Bid Evaluation Criteria

The Auction Administrator will not accept any bids for which the bid price is less than the Auction Reserve Price. The Auction Reserve Price is stated in both USD and CAD and bid prices will be evaluated against the Auction Reserve Price in the currency in which the bids are submitted (i.e., USD bids must be submitted at a price equal to or above the Auction Reserve Price in USD, and CAD bids must be at a price equal to or above the Auction Reserve Price in CAD). For the purposes of this Attachment and all examples, the Auction Reserve Price for both the Current Auction and Advance Auction is \$12.10 USD and \$13.31 CAD.

Submitted bids that contain bid quantities in excess of the purchase limit or the holding limit, or have a maximum value in excess of the bid guarantee at the settlement price, will be rejected, in bundles of 1,000 allowances, until all bid limitations are met. Only that portion of the bid quantity that exceeds one or more limit will be rejected, not the entire bid quantity. Bid quantities that have been rejected will not be considered in determining the settlement price. "Qualified bids" are the bids that remain after the submitted bids have been evaluated and reduced to meet all limits.

Determination of qualified bids occurs after the bidding window has been closed and before the settlement price is determined. The process is the same for the Current Auction and the Advance Auction. The result is a set of qualified bids from which the settlement price is determined for both the Current Auction and the Advance Auction.

Table 2 shows sample bid evaluation data for a Current Auction where 1,000,000 allowances are available. This data will be used to demonstrate how the Auction Administrator will evaluate each entity's bids submitted for the Current Auction. In some cases, a bid may exceed more than one evaluation criterion (i.e., purchase limit, holding limit, or bid guarantee value). When a bid is limited by more than one criterion, the bid will be reduced in lots of 1,000 allowances to the most limiting constraint.

Table 2: Sample Bid Evaluation

Entity Name	Entity Type	Purchase Limit (Number of Allowances)	Holding Limit (Number of Allowances) ⁴	Bid Guarantee (USD)
A	QC Emitter	250,000	13,370,000	\$3,100,000
B	CA Covered Entity	250,000	13,370,000	\$2,666,400
C	CA Electrical Distribution Utility	250,000	13,370,000	\$6,090,200
D	QC Emitter	250,000	13,370,000	\$3,126,300
E	QC Emitter	250,000	13,370,000	\$3,200,000
F	CA Covered Entity	250,000	13,370,000	\$2,450,000
G	QC Participant	40,000	13,370,000	\$3,126,300

Purchase limits in the examples throughout this Attachment are based on the percentages assigned to each entity type as described previously and assuming the following:

- Entity A is a QC Emitter
- Entity B is a CA Covered Entity
- Entity C is a CA Electrical Distribution Utility
- Entity D is a QC Emitter
- Entity E is a QC Emitter
- Entity F is a CA Covered Entity
- Entity G is a QC Participant

In the sample bid evaluation data in Table 2, the bid guarantees represent the bid

⁴ This column denotes the number of allowances that can be purchased within the current vintage holding limit. Assumes general holding account balance is zero and that allowances in the compliance account are exactly equal to the limited exemption.

guarantees submitted. In some cases, the bid guarantee is different from the maximum total value of an entity's bid schedule shown in Table 1. This is done to demonstrate how the bid guarantee criteria impacts bids if the bid guarantee is less than the bid value at a specific bid price and how the bid guarantee is used in the Advance Auction.

Since the bid guarantee and bid prices submitted in CAD are converted to USD before any bid evaluations or determination of the settlement price, the bid evaluation process is the same for bids submitted in USD and CAD.

A. Purchase Limit Evaluation

Example 6: Purchase Limit Evaluation by Comparison of Bid Schedules in Table 1 Against the Sample Bid Evaluation Data Criteria in Table 2.

Entity A: Entity A's bids are within its purchase limit of 250,000 allowances.

Entity B: Entity B's bids are within its purchase limit of 250,000 allowances.

Entity C: Entity C's bids are within its purchase limit of 250,000 allowances.

Entity D: Entity D's bids are within its purchase limit of 250,000 allowances.

Entity E: Entity E's bids are not within its purchase limit as the cumulative total of bids, 265,000 allowances, exceeds the purchase limit of 250,000 allowances. Submitted bids that contain bid quantities in excess of the purchase limit will be rejected in lots of 1,000 allowances until the purchase limit is met. Thus, only the portion of the bid that exceeds the limit will be rejected, not the entire bid. Entity E's first three bids sum to 155,000 allowances. It can purchase no more than an additional 95,000 allowances (250,000 - 155,000). Thus, Entity E's fourth bid would be limited to 95,000 allowances.

Entity F: Entity F's bids are within its purchase limit of 250,000 allowances.

Entity G: Entity G's bids are not within its purchase limit as the cumulative total of bids, 170,000 allowances, exceeds the purchase limit of 40,000 allowances. Submitted bids that contain bid quantities in excess of the purchase limit will be rejected in lots of 1,000 allowances until the purchase limit is met. Thus, only the portion of the bid that exceeds the limit will be rejected, not the entire bid. Entity G's first bid is for 50,000 allowances. Thus, Entity G's first bid would be limited to 40,000 allowances and the second bid would be rejected.

B. Holding Limit Evaluation

In Example 7, the available space within an entity's holding limit is defined as the maximum number of allowances that can be purchased by an entity at the auction while in compliance with the holding limit. These allowances, denoted as 'Holding Limit' in Table 2, indicate how many allowances an auction participant may acquire before exceeding their holding limit. This is described in Attachment A as the holding limit cap that Jurisdictions transmit to the Auction Administrator prior to the auction.

Example 7: Holding Limit Evaluation by Comparison of Bids in Table 1 against the Sample Bid Evaluation Data in Table 2.

All entities in this example meet the holding limit requirements; no bidder has bid for more than 13,370,000 cumulative allowances. Assuming there are no current or prior vintage allowances in entity general holding accounts prior to the auction, and no current or prior vintage allowances are transferred into the general holding account prior to the delivery of auction allowances, all allowances purchased at auction will be placed in the general holding accounts and will be within the current vintage holding limit.

C. Bid Guarantee Evaluation

The California Regulation requires the amount of the bid guarantee to be greater than or equal to the maximum value of the bids to be submitted. Prior to auction settlement, the Auction Administrator will evaluate the submitted bid guarantee for each entity for the Current Auction in USD, regardless of the currency in which bids are submitted. As an entity provides a single bid guarantee, any funds remaining once the Current Auction settlement price has been determined will be applied to the Advance Auction. The settlement price algorithm is structured to recognize that a bid that is limited by the bid guarantee at a submitted bid price may not be limited as much or limited at all at other potential settlement prices. If a bid quantity is limited by the bid guarantee at the submitted bid price, but could be fulfilled if the settlement price is lower than the submitted bid price, the bidder will be awarded allowances up to the bid quantity and the limits of the bid guarantee.

Example 8 below illustrates an example in which an entity's bid guarantee as provided in Table 2 is insufficient to cover its maximum total bid cost provided in Table 1. All bid guarantee examples below reflect a USD bid guarantee value.

Example 8: Bid Guarantee Evaluation

Entity A: Entity A's bid guarantee of \$3,100,000 USD is sufficient to cover its maximum total bid cost of \$3,100,000 USD.

Entity B: Entity B's bid guarantee of \$2,666,400 USD is not sufficient to cover its maximum total bid cost of \$3,030,000 USD. The Auction Administrator would reduce Entity B's 2nd bid to 140,000 allowances. A total of 220,000 allowances can be purchased with the submitted bid guarantee ($\$2,666,400 / \$12.12 \text{ USD} = 220,000$). The total number of allowances that can be purchased through the second bid is 140,000 ($220,000 - 80,000$). Thus, Entity B's second bid would be limited to 140 bid lots based on the bid guarantee limitation. See Table 1 for Entity B's bidding details.

Entity C: Entity C's bid guarantee of \$6,090,200 USD is sufficient to cover its maximum total bid cost of \$6,090,150 USD.

Entity D: Entity D's bid guarantee of \$3,126,300 USD is sufficient to cover its maximum total bid cost of \$3,126,300 USD.

Entity E: Entity E's bid guarantee of \$3,200,000 is not sufficient to cover its maximum total bid cost of \$3,206,500. The Auction Administrator would reduce Entity E's fourth bid to 109,000 allowances. A total of 264,462 allowances can be purchased with the submitted bid guarantee ($\$3,200,000 / 12.10 = 264,462$). Rounded down to nearest bid lot, the total number of allowances that can be purchased through the fourth bid is 109,000 ($264,000 - 155,000$). Thus, Entity E's fourth bid would be limited to 109 bid lots based on the bid guarantee limitation. See Table 1 for Entity E's bidding details.

Entity E's fourth bid did not pass the purchase limit evaluation or the bid guarantee evaluation. When a bid is limited by more than one criterion, the bid will be reduced in lots of 1,000 allowances to the most limiting constraint. A reduction of the fourth bid to 109,000 allowances would meet the bid guarantee limit but not the purchase limit, which requires the fourth bid to be reduced to 95,000 allowances. The bid must pass all evaluations to be qualified and in this example, the most limiting criterion is the purchase limit. The total number of allowances that can be purchased through the fourth bid in order to meet the purchase limit is 95,000 ($250,000 - 155,000 = 95,000$). Entity E's qualified fourth bid is 95 bid lots.

Entity F: Entity F's bid guarantee of \$2,450,000 USD is sufficient to cover its maximum total bid cost of \$2,420,000 USD.

Entity G: Entity G's bid guarantee of \$3,126,300 USD is sufficient to cover its maximum total bid cost of \$3,126,300 USD. However, as discussed above, it is limited by its purchase limit and thus the first bid is reduced to 40,000, and the second bid is rejected.

Table 3 shows the qualified bids after the Auction Administrator has completed the bid evaluation process, with the adjusted bid quantities shaded in grey. These are the bids that would be used in calculating the settlement price. Please note that the cumulative allowances and bid costs are also adjusted to reflect adjusted bid quantities where applicable.

Table 3: Bids Accepted by Auction Administrator

Entity Name	Bid Price	Submitted Bid Lots	Qualified Bid Allowances	Cumulative Qualified Bid Allowances by Entity	Bid Value at Each Bid Price
A	\$22.69	40	40,000	40,000	\$907,600
A	\$18.45	55	55,000	95,000	\$1,752,750
A	\$15.43	70	70,000	165,000	\$2,545,950
A	\$12.40	85	85,000	250,000	\$3,100,000
B	\$17.79	80	80,000	80,000	\$1,423,200
B	\$12.12	170	140,000	220,000	\$2,666,400
C	\$43.05	25	25,000	25,000	\$1,076,250
C	\$38.95	50	50,000	75,000	\$2,921,250
C	\$36.91	90	90,000	165,000	\$6,090,150
D	\$21.54	50	50,000	50,000	\$1,077,000
D	\$18.39	120	120,000	170,000	\$3,126,300
E	\$19.72	35	35,000	35,000	\$690,200
E	\$17.55	50	50,000	85,000	\$1,491,750
E	\$15.43	70	70,000	155,000	\$2,391,650
E	\$12.10	110	95,000	250,000	\$3,025,000
F	\$12.10	200	200,000	200,000	\$2,420,000
G	\$19.72	50	40,000	40,000	\$788,800
G	\$18.39	120	0	40,000	\$0

V. Settlement Price Determination Procedures

The process to determine the settlement price requires that the Auction Administrator rank qualified bids from all bidders from highest to lowest bid price using the USD value of the bids. Allowances will be awarded to bidders, beginning with the highest qualified bid price and moving to successively lower qualified bid prices, until the entire supply of allowances is exhausted or all qualified bids have been filled. Each bid will be assessed against purchase and holding limits and the value of the bid guarantee as described in the previous section. The bid price at which all available allowances are sold or all qualified bids are filled becomes the settlement price; this is the price per allowance that all bidders will be charged for the allowances won in the auction. Bids submitted at prices below the settlement price will not be awarded any allowances.

In determining the settlement price, the Auction Administrator may find that the quantity of allowances bid for at a specific price exceeds the remaining allowances available for sale. When this occurs, a tiebreaker procedure is used to determine the number of allowances awarded to each bidder.

This section provides three (3) examples of the calculation of the settlement price. The first example (Example 9), results in the sale of all available allowances with the last winning bid completely exhausting the available allowances. The second example (Example 10) shows the settlement price determination when an entity's bid schedule is limited by the entity's submitted bid guarantee. The third example (Example 11) illustrates the tiebreaker procedure.

Example 9: Settlement Price When the Last Winning Bid Exhausts the Available Allowances

This example is for bids submitted in the Current Auction. (The process for determining the settlement price is the same for the Current and Advance Auctions.) Qualified bids from Entities A to G in the bid evaluation process provided in Table 3 are used in this settlement price example. For this example, the quantity of allowances available for sale is 1,000,000.

All qualified bids submitted by all bidders are ranked from the highest qualified bid price to the lowest qualified bid price using the USD value of the bid prices. In Table 4, the 5th column (Auction Cumulative Qualified Bid Allowances) shows cumulative allowances, that is, the sum of qualified bid allowances bid for at that bid price and the number of qualified bid allowances bid at all higher bid prices, not cumulative qualified bid allowances bid for by entity. The 6th column (Allowance Supply Remaining) shows allowances remaining to be sold, which is the difference between the allowance supply of 1,000,000 and the Auction Cumulative Qualified Bid Allowances in the 5th column.

Table 4: Single Round, Sealed Bid Format Example

Entity Name	Bid Price	Submitted Bid Lots	Qualified Bid Allowances	Auction Cumulative Qualified Bid Allowances	Allowance Supply Remaining
C	\$43.05	25	25,000	25,000	975,000
C	\$38.95	50	50,000	75,000	925,000
C	\$36.91	90	90,000	165,000	835,000
A	\$22.69	40	40,000	205,000	795,000
D	\$21.54	50	50,000	255,000	745,000
E	\$19.72	35	35,000	290,000	710,000
G	\$19.72	50	40,000	330,000	670,000
A	\$18.45	55	55,000	385,000	615,000
D	\$18.39	120	120,000	505,000	495,000
G	\$18.39	120	0	505,000	495,000
B	\$17.79	80	80,000	585,000	415,000
E	\$17.55	50	50,000	635,000	365,000
A	\$15.43	70	70,000	705,000	295,000
E	\$15.43	70	70,000	775,000	225,000
A	\$12.40	85	85,000	860,000	140,000
B	\$12.12	170	140,000	1,000,000	0
E	\$12.10	110	95,000	1,095,000	0
F	\$12.10	200	200,000	1,295,000	0

At the highest bid price of \$43.05 USD, only 25,000 allowances have been sold and 975,000 allowances remain. At the next lower bid price, \$38.95 USD, a total of 75,000 allowances have been sold and 925,000 allowances remain to be sold. Continuing down the 6th column, at the bid price of \$12.12 USD, the entire available supply of allowances is sold and qualified bids at prices below \$12.12 USD cannot be filled. Hence, the settlement price is \$12.12 (shaded in grey in Table 4) and 1,000,000 allowances are sold at a total bid cost of \$12,120,000 USD.

Entity A would win 250,000 allowances from its four bids, and its total bid cost is \$3,030,000 USD (250,000 * \$12.12 USD). Allowances won by each bidder and their respective total bid cost are shown in Table 5. If Entity A is a QC entity and has submitted a bid guarantee and bids in CAD, the total bid cost of \$3,030,000 USD will be converted to CAD for payment. With an Auction Exchange Rate of 1.1000, this

bidder's CAD payment due is \$3,333,000 (250,000 * \$12.12 * 1.1 = \$3,333,000).

Table 5: Winning Bids Example

Bidder Name	Allowances Won	Total Cost (USD)	Total Cost (CAD)
A	250,000	\$3,030,000	\$3,333,000
B	220,000	\$2,666,400	n/a
C	165,000	\$1,999,800	n/a
D	170,000	\$2,060,400	\$2,266,440
E	155,000	\$1,878,600	\$2,066,460
F	0	0	n/a
G	40,000	\$484,800	\$533,280
Total	1,000,000	\$12,120,000	n/a

Example 10: Settlement Price Determination When an Entity's Bid Schedule is Limited by the Entity's Submitted Bid Guarantee

Quantity of allowances available for sale in this example = 1,060,000. Example 10 includes the same bid submissions as used in Example 9, the first settlement price example. However, the larger supply of allowances would increase the purchase limits to those shown in Table 6. Bid guarantees for purposes of this example are also shown in Table 6; note that the bid guarantee for Entity F has been revised.

Table 6: Sample Bid Evaluation Data

Entity Name	Purchase Limit (Number of Allowances)	Holding Limit (Number of Allowances)	Bid Guarantee (USD)
A	265,000	13,370,000	\$3,100,000
B	265,000	13,370,000	\$2,666,400
C	265,000	13,370,000	\$6,090,200
D	265,000	13,370,000	\$3,126,300
E	265,000	13,370,000	\$3,200,000
F	265,000	13,370,000	\$100
G	42,400	13,370,000	\$3,126,300

Entity A: Entity A's bids are within its purchase limit and the bid guarantee.

Entity B: Entity B's bids are within its purchase limit. However, Entity B's second bid exceeds the submitted bid guarantee and is limited to 140,000 allowances (140 lots).

Entity C: Entity C's bids are within its purchase limit and the bid guarantee.

Entity D: Entity D's bids are within its purchase limit and the bid guarantee.

Entity E: Entity E's bids are within its purchase limit. However, Entity E's fourth bid exceeds the submitted bid guarantee and is limited to 109,000 allowances (109 bid lots).

Entity F: Entity F's bids are within the purchase limit. However, Entity F's bid exceeds the submitted bid guarantee and is limited to zero allowances.

Entity G: Entity G's first bid exceeds the purchase limit and is limited to 42,000 allowances (42 bid lots), while Entity G's second bid is rejected. Entity G's bids are within the bid guarantee.

Table 7 shows the calculation of the settlement price determination with a bid guarantee limit in an auction with 1,060,000 allowances for sale. In this instance, the settlement price falls to \$12.10 USD.

Table 7: Settlement Price Determination with a Bid Guarantee Limit

Entity Name	Bid Price	Qualified Bid Lots	Qualified Bid Allowances	Cumulative Allowances	Allowance Supply Remaining
C	\$43.05	25	25,000	25,000	1,035,000
C	\$38.95	50	50,000	75,000	985,000
C	\$36.91	90	90,000	165,000	895,000
A	\$22.69	40	40,000	205,000	855,000
D	\$21.54	50	50,000	255,000	805,000
E	\$19.72	35	35,000	290,000	770,000
G	\$19.72	42	42,000	332,000	728,000
A	\$18.45	55	55,000	387,000	673,000
D	\$18.39	120	120,000	507,000	553,000
G	\$18.39	0	0	507,000	553,000
B	\$17.79	80	80,000	587,000	473,000
E	\$17.55	50	50,000	637,000	423,000
A	\$15.43	70	70,000	707,000	353,000
E	\$15.43	70	70,000	777,000	283,000
A	\$12.40	85	85,000	862,000	198,000
B	\$12.12	140	140,000	1,002,000	58,000
E	\$12.10	109	109,000	1,111,000	0
F	\$12.10	0	0	1,111,000	0

Entity E's bid at \$12.10 would be awarded a total of 58,000 allowances, the total allowance supply remaining.

The settlement price algorithm is structured to recognize that a bid that is limited by the bid guarantee at a submitted bid price may not be limited as much or limited at all at other potential settlement prices. If a bid quantity is limited by the bid guarantee at the submitted bid price, but could be fulfilled if the settlement price is lower than the submitted bid price, the bidder will be awarded allowances up to the bid quantity and the limits of the bid guarantee. However, the settlement price algorithm will not sell the bidder more allowances than they bid for.

For a Current Auction allowance supply of 1,060,000 allowances, the allowances won by each bidder and their respective total bid cost are shown in Table 8.

Table 8: Winning Bids Example

Bidder Name	Allowances Won	Total Cost (USD)	Total Cost (CAD)
A	250,000	\$3,025,000	\$3,327,500
B	220,000	\$2,662,000	n/a
C	165,000	\$1,996,500	n/a
D	170,000	\$2,057,000	\$2,262,700
E	213,000	\$2,577,300	\$2,835,030
F	0	0	n/a
G	42,000	\$508,200	\$559,020
Total	1,060,000	\$12,826,000	n/a

Example 11: Tiebreaker Example

Section 95911(e)(5) of the California Regulation and Article 52 of the Québec Regulation specify that the tiebreaker procedure is used when the sum of bid quantities at a specific bid price exceeds the remaining allowances available for sale. During the tiebreaker procedure, each entity that has submitted qualified bids at or above the settlement price will be awarded allowances based on its share of submitted and qualified bids at the settlement price. An entity does not have to submit a bid at the settlement price to be included in the tiebreaker, but must have additional ability to purchase at the settlement price based on the bids submitted.

Each entity is awarded allowances based on its share of submitted and qualified bids at the settlement price times the number of allowances remaining to be sold, rounded

down to the nearest whole allowance. If there are allowances remaining as a result of rounding down, those allowances are awarded to entities by assigning a random number to each entity. The remaining allowances are awarded to entities starting with the lowest assigned random number and proceeding to the next higher random number until all remaining allowances are awarded. Under the tiebreaker procedure, allowances may not be sold in bundles of 1,000.

Table 10 illustrates the bids from a single round, sealed bid auction format, and is designed to highlight the tiebreaking process. Example 11 includes the same bid submissions as used in Examples 9 and 10. The quantity of allowances available for sale for this example is 850,000. The bid evaluation data for this example including bid guarantee amount, purchase limit, and holding limit for each entity is provided in Table 9; note that the bid guarantee for Entity B has been revised.

Table 9: Sample Bid Evaluation Data

Entity Name	Purchase Limit (Number of Allowances)	Holding Limit (Number of Allowances)	Bid Guarantee (USD)
A	212,500	13,370,000	\$3,100,000
B	212,500	13,370,000	\$968,000
C	212,500	13,370,000	\$6,090,200
D	212,500	13,370,000	\$3,126,300
E	212,500	13,370,000	\$3,200,000
F	212,500	13,370,000	\$2,450,000
G	34,000	13,370,000	\$3,126,300

Entity A: Entity A's fourth bid exceeds its purchase limit and is limited to 47,000 allowances (47 bid lots). Entity A's bids are within its bid guarantee.

Entity B: Entity B's second bid exceeds the purchase limit and is limited to 132,000 allowances (132 bid lots). Entity B's first bid also exceeds the submitted bid guarantee. Entity B's first bid would be limited to 54,000 allowances (54 bid lots) at the bid price of \$17.79, as Entity B can purchase 54,000 allowances at the bid price of \$17.79 ($\$968,000 / 17.79 = 54,412$). Rounded down to nearest bid lot, the total number of allowances that can be purchased through the first bid is 54,000. As the settlement price algorithm is structured to recognize that Entity B's bids may not be limited as much at other settlement prices, Entity B's first bid is reviewed to determine the number of allowances that can be purchased at lower settlement prices. Entity B's first bid is evaluated at the next valid price point of \$12.12. Entity B can purchase 79,000 allowances at the bid price of \$12.12 ($\$968,000 / \$12.12 = 79,868$). Rounded

down to nearest bid lot, the total number of allowances that can be purchased at \$12.12 is 79,000. Entity B's qualified bid at \$12.12 is 25,000 allowances. This equals the total number of allowances Entity B can purchase at \$12.12 (79,000) less the portion of the Entity B's first bid that is a qualified bid at \$17.79 (54,000). As described below, Entity B will be awarded allowances up to the bid quantity and the limits of its bid guarantee at the settlement price.

Entity C: Entity C's bids are within its purchase limit and bid guarantee.

Entity D: Entity D's bids are within its purchase limit and bid guarantee.

Entity E: Entity E's fourth bid exceeds the purchase limit and is limited to 57,000 allowances (57 bid lots). However, Entity E's fourth bid also exceeds the submitted bid guarantee and is limited to 109,000 allowances (109 bid lots). As Entity E's bids must conform to both the bid guarantee and the purchase limit, Entity E's fourth bid is limited to 57,000 allowances.

Entity F: Entity F's bids are within the purchase limit and the bid guarantee.

Entity G: Entity G's first bid exceeds the purchase limit and will be limited to 34,000 allowances (34 bid lots), while Entity G's second bid is rejected. Entity G's bids are within the bid guarantee.

Table 10 shows the determination of the settlement price for the allowance supply of 850,000 allowances. Again, bids from all bidders are ranked from highest bid price to lowest bid price. At the settlement price in Example 9 of \$12.12 USD, there are 35,000 allowances remaining to be sold, but at the next bid price of \$12.10 USD, Entities B, E, and F have submitted or qualified bids for 258,000 allowances (as indicated in Table 10 by the qualified bid allowances corresponding to the number of allowances remaining for sale at a price of \$12.10 USD). For this Current Auction, the settlement price is \$12.10 USD where all 850,000 allowances are sold. The Auction Administrator must implement the tiebreaker procedure to determine allowances won by Entities B, E, and F at the settlement price.

Table 10: Settlement Price Determination with a Tiebreaker

Entity Name	Bid Price	Qualified Bid Lots	Qualified Bid Allowances	Cumulative Allowances	Allowance Supply Remaining
C	\$43.05	25	25,000	25,000	825,000
C	\$38.95	50	50,000	75,000	775,000
C	\$36.91	90	90,000	165,000	685,000
A	\$22.69	40	40,000	205,000	645,000
D	\$21.54	50	50,000	255,000	595,000
E	\$19.72	35	35,000	290,000	560,000
G	\$19.72	34	34,000	324,000	526,000
A	\$18.45	55	55,000	379,000	471,000
D	\$18.39	120	120,000	499,000	351,000
G	\$18.39	0	0	499,000	351,000
B	\$17.79	54	54,000	553,000	297,000
E	\$17.55	50	50,000	603,000	247,000
A	\$15.43	70	70,000	673,000	177,000
E	\$15.43	70	70,000	743,000	107,000
A	\$12.40	47	47,000	790,000	60,000
B	\$12.12	25	25,000	815,000	35,000
E	\$12.10	57	57,000	872,000	0
F	\$12.10	200	200,000	1,072,000	0
B	\$12.10	1	1,000	1,073,000	0

Entity B's first bid was limited to 79,000 allowances at a bid price of \$12.12. However, as the settlement price was \$12.10, Entity B is able to purchase an additional 1,000 allowances and not exceed its bid guarantee of \$968,000. In Table 10, Entity B has a bid for 1 bid lot at \$12.10, shaded in grey. This is not a bid that is in Entity B's bid schedule but represents the additional qualified bid allowances that Entity B can purchase at a settlement price of \$12.10, as compared to the submitted bid of \$12.12 for the second bid in Table 1. Entity B's qualified bid allowances of 79,000 allowances at \$12.12 are awarded in the settlement process; however, at the price of \$12.10, Entity B can purchase an additional 1,000 allowances and is part of the tiebreaker with Entity E and Entity F.

Entities B, E, and F have qualified bid allowances totaling 258,000 at the bid price of \$12.10 USD.

Entity B's share is 0.3 percent ($1,000 / 258,000 = 0.003875969$).
 Entity E's share is 22.1 percent ($57,000 / 258,000 = 0.220930233$).
 Entity F's share is 77.6 percent ($200,000 / 258,000 = 0.775193798$).

Entity B would be awarded 135 allowances ($0.003875969 * 35,000$, rounded down to the nearest whole allowance).

Entity E would be awarded 7,732 allowances ($0.220930233 * 35,000$, rounded down to the nearest whole allowance).

Entity F would be awarded 27,131 allowances ($0.775193798 * 35,000$, rounded down to the nearest whole allowance).

The total number of allowances awarded through this process is 35,998; two allowances remain to be awarded to the lowest random number. If Entity B is assigned a random number of 200, Entity E is assigned a random number of 5, and Entity F is assigned a random number of 77, one allowance is awarded to Entity E and one allowance is awarded to Entity F.

While Entity B could have purchased up to 80,000 allowances at the settlement price of \$12.10, due to the tiebreaker process Entity B is awarded a total of 79,135 allowances ($54,000 + 25,000 + 135 = 79,135$).

Allowances won in the tiebreaker are added to allowances won at higher bid prices. For example, Entity E's total allowances are 162,733 ($35,000 + 50,000 + 70,000 + 7,732 + 1$).

Allowances won by each bidder and their respective total bid cost are shown in Table 11.

Table 11: Winning Bids Example

Bidder Name	Allowances Won	Total Cost (USD)	Total Cost (CAD)
A	212,000	\$2,565,200.00	\$2,821,720.00
B	7935	\$957,533.50	n/a
C	165,000	\$1,996,500.00	n/a
D	170,000	\$2,057,000.00	\$2,262,700.00
E	162,733	\$1,969,069.20	\$2,165,976.23
F	27,132	\$328,297.20	n/a
G	34,000	\$411,400.00	\$452,540.00
Total	850,000	\$10,285,000.00	n/a

VI. Bid Evaluation in Advance Auction

In the bid evaluation examples provided in this Attachment, the assumption is that bids were submitted for a Current Auction. The bid evaluation process for an Advance Auction is the same, although the bid guarantee available, purchase limits, and holding limits would be different.

Bidders submit a single bid guarantee for both the Current Auction and Advance Auction. As shown in Example 3, once the Current Auction settlement price has been determined, the entity's total cost for allowances awarded in the Current Auction (USD settlement price multiplied by number of allowances awarded) will be determined and deducted from the bid guarantee amount, and any bid guarantee amount remaining will be applied to the Advance Auction.