New barriers to invest in RES-E projects

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Introduction

Could new RES-E support regime deter developers to invest?

A little reminder:

Binding commitment to reach a Share of RES in the energy/electricity sector (20% objective 2020, possibly 30% and more in 2030)

It means for RES-E capital intensive technologies, a double function of the support instrument

- Insure the fixed cost recovery (transfer of the price risk on consumers)
- Subsidization of non mature technologies

Need of a price instrument because it secures fixed costs recovery

(RES obligation which adds risks to risks)

- So « operating aid » on long term (15 years):
- Feed in tariffs per MWh aligned on estimated LRMC (with learning factor, difference of wind/solar resources) to limit rents

1. Motivation of the revision

- 2. Increasing risks with new supports
 - Feed-in premium
 - Definition of support level by auctioning

I do not evoke the technology neutrality rule

1. The revision of the RES-E support 1.1. Critics of FIT

No exposure to hourly market price (incentives to improve generation forecasts)

- no balancing responsibility
- they produce when negative prices without incentive to stop to generate power

Possibility of rents if bad calibration (under regulatory capture)

Long term effects:

- Risk of overshooting if no flexible rule of
- increasing support cost ,
 - especially with increased capa. & merit order effects of capacity deployment/averaged price decline
- overcapacity because lower price: misinterpretation:

Revision of RES-E support by 2017

To be authorized, operating aids for RES should be:

Paid in from Feed-In Premiums (FiP)

Granted by bidding process to reveal LRMC by market based instrument

-Exception for equipment of less than 0.5MW mainly PV and 3 MW for windpower (can keep FIT)

Granted by technology neutral bidding process (to not distort competition)

- –Exception to technology neutrality
- •in order to achieve some diversification
- Exception for less mature technology
- -Beneficiaries are subject to standard balancing responsibilities, (unless no liquid intra-day markets)

Measures for no incentive to generate electricity under negative prices

What are we trying to improve?

Beyond the beliefs in market's and competition's virtues

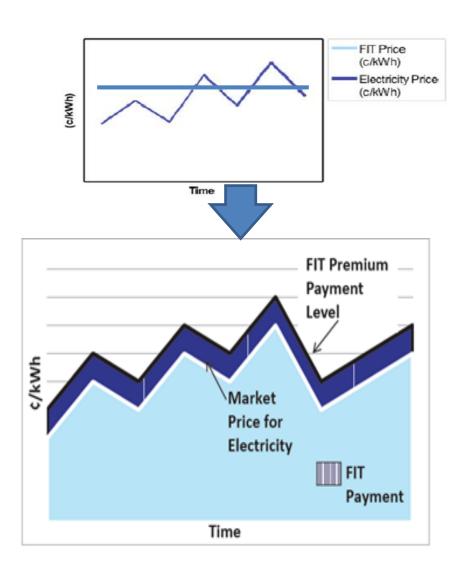
- Any substitute to FIT refers more or less to a reference LRMC of each RES-E, even when learning factor
 - fixed FIP per MWh and per MW referred to it at the initial date
 - variable FIP per MWh or per MW at each redefinition date
 - strike price of the CfDs (a symmetrical FIP) at the intial date

The main goals of new instruments:

- To expose the RES-E producer to electricity market prices (energy and reliability products), but for what?
 - 1. With FITs, incentive to be reliable each hour, in particular during peak
 - 2. Negative prices problem could be easily fixed (no payment during episods)
 - 3. Market price have lost their function of long term price signal
 - Not invest in any technology if avera price is too low
 - Too much RES-E not related to lower average prices
- Auctioning is supposed to reveal the cost and avoid rent by long term competition,
 - But it is in a so uncertain environment (see below)

2. New risks and barriers to invest for Res-E investors

2.1.Investment risks with FIPs compared to FIT



- Fixed FIP per MWh or per MW are the most risky
- Variable FIPs revised each month: some risks with time lag of revision

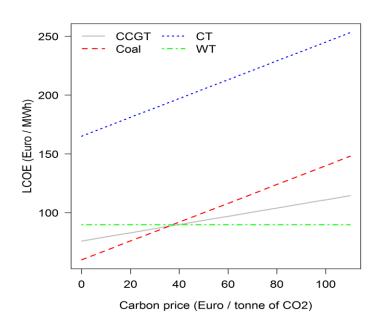
with FIT, no revision

- As for FIT, balancing responsibility must be compensated in the FIPs
- Advantage
 - FIP MWh partly deter to run during negative prices episods
 - FIP per MW = complete disincentive

Issue of determination of the FIP in relation to anticipated hourly elec. prices: a parallel with carbon price

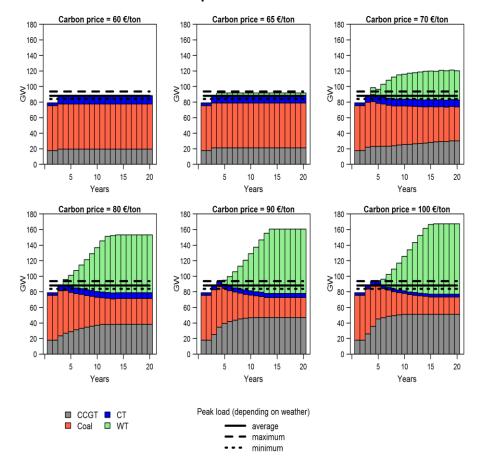
(M. Petitet, 2014)

Levelized cost of electricity
 (LCOE):Wind power is competitive
 if the carbon price is higher than €
 40 per tonne of CO₂ emissions.



System dynamics market simulation

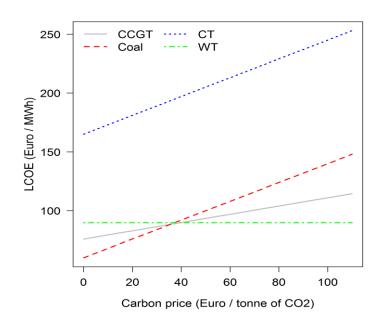
Wind power is part of generation mix if carbon price is higher than €70 per ton of CO2. Installed wind capacity increases with the carbon price.



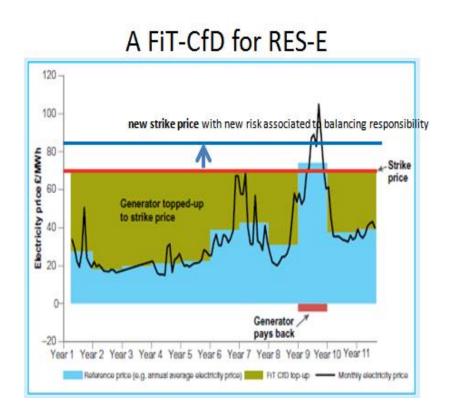
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2.2. CfD-FIT: Ideal instrument to manage risks It mimics FIT market-based incentives



Advantage for investor

Credibility of the « contract » (not FIP or FIT exposed to public policy change) Visibility of revenues

Implementation

Necessity to increase the strike price in relation to balancing responsibility

Choice of the reference price as the daily average price

Social efficiency advantages

Exposure to hourly prices
Balancing responsibility
Compare to FIT, CfDs allows greater
market liquidity

Lower capital cost with risk borne by consumers, via a levy

Negociation around the strike price and the contract for 15 years

- this includes the current projections for wholesale prices (with the risk to pay back)
- the cost of balancing responsibility
- the grid cost
- the rule of cost decrease via the learning
- the indexation to the Consumer Price Index (as opposed to the Retail Price Index);
- the effective tax rate of an average developer;
- the lower cost of capital as a result of the increased price ncertainty afforded by the CfD

2.3. Auctioning to define FIP or Strike price

Three problems

- Classical problem of auctioning if illiquid market (collusion, etc.)
 - quid if geographic zonage?
- Transactions costs of applying, in particular for small sized projects below 10-15MW
 - Preparation without guarantee to be selected
- Risks shifting: new risks on the developper/investor

How to anticipate the difference between project costs (unforeseen ones) and average annual revenue based on hourly electricity price?

- Impacts of evolution of the technology mix (with RES), its wholesale price effects, the possible emergence of carbon price
- Impact of the development of flexibility offers on the costs of respossibility

3. Conclusion: Is the game worth the candle?

For each instrument FIP, except CfD which keep the virtue of FIT it is at the detriment of the risk management.

Increase the cost of capital and so increasing the general cost of the RES-E policy
With investment at 1600€/kW

Discount rate at 5% : € 65/ MWh v/s DR at 8%: €90 /MWh

Deterring entries/investment in RES-E with lower chance to reach the binding target of 2020

Secundary problems (negative price) should not be the rationale to skip from an effective support

Balancing responsibility (BR) is the good answer,

but do not forget that cost of BR would introduce risks and would increase price bids in auctioning of FIPs

Besides CfDs, FIT remains valuable with a monitoring of the quantity and price revision for new plants