



BANK OF ENGLAND

Speech

Remarks given as a discussant of “Passthrough Efficiency in the Fed’s new Monetary Policy Setting” by Darell Duffie and Arvind Krishnamurthy

Remarks given by

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Introduction

Thank you for the opportunity to discuss this paper, which brings together many of the themes of this timely and important conference. Interest in the pass-through of central banks' policy rates has enjoyed something of a resurgence in recent times, as the Federal Reserve begins to tighten policy in the presence of a vast amount of reserves created by quantitative easing, and as other central banks loosen further by moving their policy rates to new record lows.

Of course the Bank of England is in the latter camp. This month the Monetary Policy Committee (MPC) – of which I am a member – voted to introduce a package of measures to support the necessary adjustments of the UK economy as it responds to the decision to leave the European Union. This package included a reduction in Bank Rate to a new low of 0.25%, and the launch of a Term Funding Scheme to reinforce the pass-through of this cut, alongside a £60bn increase in our stock of UK government bonds and the purchase of up to £10bn of investment grade non-financial corporate bonds.

As central bankers and money market enthusiasts know, the issue of pass-through is of utmost importance. The paper begins with the premise that a necessary condition for competitive money markets is that any change in the Fed's policy rate is passed through, one for one, to all market transaction rates. In truth, one can make the much broader statement that the very efficacy of monetary policy and its usefulness as a tool for influencing the economy is premised on the pass-through of changes in policy rates to money market rates. And that's why some of us have endless appetite to discuss any wedge between them.

With that in mind, I'd like to pick up on two of the central themes of Darell and Arvind's paper.

- The first is the impact of regulation – in particular the leverage ratio - on money market function. I will restate the case for having a leverage ratio, but will also argue that it can be much improved by the exclusion of central bank reserves from the exposure measure.
- The second is the role of central banks in money markets. Building on the paper's analysis of the Fed's Reverse Repo Facility (RRP), I will make the case that central banks are now more proactive in: the influencing of market rates; the provision of liquidity insurance, and the design of market infrastructure.

Finally, I'd like to say a few words about pass-through beyond the money markets. As interest rates decline toward zero, it becomes more difficult for banks to pass through changes in policy rates to those rates faced by households and businesses – hampering the transmission of monetary policy. The Term Funding Scheme is designed to mitigate this impact, and hence re-inforce pass-through to the real economy. So I'll end by briefly outlining how that works.

The impact of regulation on money market function

Let me start with the impact of regulation on money market function. Darell and Arvind's analysis of the dispersion of money market rates offers evidence of the impact of regulation on behaviour and pricing. Their index of money market rate dispersion has risen since the introduction of the Supplementary Leverage Ratio, and has a tendency to increase around key regulatory reporting dates (Chart 1).

It is difficult to dispute the idea that regulation has had an impact on how markets function globally. The decline in repo market activity has actually been larger in the UK than in the US and is around 20% below its 2013 level (Chart 2). And the price of repo in sterling markets has increased approximately in line with its US counterpart, as measured by the increase in GC repo rates relative to 3-month OIS swaps that carry similar economic risks (Chart 3). Alongside this there has been a deterioration in perceptions of overall sterling secured market function over the past year or so, which participants note has coincided with pressure to reduce balance sheet size due to regulatory reporting requirements – in particular the leverage ratio (Chart 4).

Some of this impact may be transitory: as dealers and others adjust to the new arrangements they may find ways to transact more efficiently while staying within the letter and spirit of the regulation. As the paper describes, opportunities for netting could be further increased were a greater proportion of repo transactions to be centrally cleared – around 10% of US Dollar repo transactions are currently cleared centrally, compared with 45% in Sterling, and 65% in Euro.¹ Dealers may improve the optimisation of their balance sheets across the whole group, better allocating leverage headroom in one part of the business to more leverage-constrained activity in other parts of the group. And over time new approaches to intermediation could emerge – some exchanges are exploring platforms to allow end users of the repo market (such as pension funds) to transact directly with one another.

However, such innovations and adjustments will only ever provide a partial offset to the underlying changes. And Darell and Arvind are right to say that regulation bears a social cost by increasing segmentation and reducing incentives to compete, search and match in money markets. But it would *not* be right to then conclude that the framework of regulation that was introduced following the crisis represented a net cost to society. Would it really be desirable to return to a world in which, as Pozsar (2016) put it, the quantities traded were “endless”, and the impact on balance sheet “an afterthought”?

The role of the leverage ratio

Given that I am a member of the Financial Policy Committee (FPC), which has been one of the architects of the post crisis regulatory framework in the UK and put a leverage ratio in place in 2015, you probably won't

¹ Source: Federal Reserve Bank of New York (<https://www.newyorkfed.org/medialibrary/Microsites/arrc/files/2016/ARRC-roundtable-slides.pdf>); Money Market Liaison Committee Sterling Money Market Survey; European Central Bank Euro Money Market Survey.

be surprised to hear that I support the existence of the leverage ratio. Remember that over the period from 2000 to 2007 around a quarter of dealers held less than enough equity to absorb losses worth 2% of their assets. That was facilitated by an over-reliance on risk weighting, which tended to place too much weight on periods of stability and too little on periods of underperformance. It's now clear that in the years before the crisis banks were underpricing the use of their balance sheet, and that the dispersion of rates in money markets probably underestimated the true real marginal cost of intermediation.

This view has been formalised in numerous studies that have found the leverage ratio was a better predictor of bank failure during the crisis than the risk-weighted capital ratio (Chart 5)². And recent studies (such as Fender and Lewrick (2015) and Grill, Hannes and Smith (2015)) suggest that a calibration of 3-5% maximises the benefits to society in the form of greater financial system resilience relative to the impact of higher bank funding costs.

However, despite my belief in the utility of the leverage ratio, I also recognise that no regulation is perfect. And that if we policymakers spot opportunities to minimise regulation's adverse impact on the liquidity of core financial markets without compromising the positive effect on resilience, we should take them.

Reducing unintended consequences

The FPC actively seeks out these improvements - a process we refer to as "snagging" in reference to the process by which a newly constructed building is checked for protruding nails and screws which could snag and tear one's clothing. (If only all architects were so diligent.)

As a result of one such snagging exercise – our annual statutory review of the leverage ratio Direction – this month we made the decision to exclude central bank reserves from the exposure measure of the leverage ratio framework. This change was a good example of close co-ordination between macroprudential and monetary policy – without it a loosening of monetary policy through the creation of reserves by the MPC to purchase assets would have led to a deterioration in banks' leverage ratios at precisely the time we would like them to support credit growth in the economy.

In making this decision we were comfortable that it wouldn't dilute the financial stability benefits of the leverage ratio because, as you know, central bank reserves are a unique asset class. So long as they are matched by liabilities in the same currency (which we have stipulated as a condition of their exclusion), they pose neither credit nor liquidity risk. And banks' holdings of them represent a buffer against unexpected events.

² For example, IMF (2009) and Aikman et al (2014), and others.

It is true that this change will mechanically reduce the nominal amount of capital required to meet the leverage ratio standard, other things equal. That is not the FPC's intention, and so we intend to re-calibrate the standard to offset this impact as part of our planned 2017 review of the leverage ratio framework.

To be clear, removing central bank reserves from the leverage exposure measure will not neutralise all of the impact of the leverage ratio that Darell and Arvind highlight - for example repo will be unaffected by this change. However it should address some of the other issues around money market rate dispersion and pass-through efficiency raised in the paper.

- If central bank reserves are included in the leverage exposure measure, banks must think carefully before accepting a deposit. If it implies an increase in their overall asset size, their leverage capital requirement will increase commensurately, and that will bring a shadow regulatory cost of the same order of magnitude as those calculated in the paper. This disincentivises competition for deposits, and drives a wedge between the central bank policy rate and rates that banks will pay on wholesale deposits.
- If central bank reserves are removed from the exposure measure it instantly gives banks somewhere to place cash without impacting their leverage ratio. They would therefore maximise profits by competing for deposits at rates all the way up to the rate that can be earned on reserves at the central bank, thus improving pass-through to average bank deposit rates and strengthening the transmission of monetary policy to the real economy. And the early indication from market participants is that they do indeed expect this change to strengthen the link between money market rates and Bank Rate.

In short, although regulatory innovations such as the leverage ratio are here to stay, we can and should attenuate some of their impact on money market function where it is possible to do so without reducing the financial stability benefits. This process of reducing unintended consequences is made easier by close co-ordination of different policymakers, which at the Bank of England is facilitated by having monetary, macro- and micro-prudential policy all under one roof.

The role of central banks in money markets

Let me turn to the role of central banks as a participant in money markets. Just as private market participants have grappled with new challenges in the post-crisis world, so too have central banks. And we have responded in three ways.

First, we have become more flexible in the way we implement changes in the policy rate. The frameworks we use to influence market rates need to recognise the fact that there are a lot more reserves in the system than before, and that regulation has reduced the incentive to arbitrage small differences in money market rates.

As the paper sets out, the Fed's RRP is a good example of adapting to this new reality. The facility improves pass-through efficiency by offering a risk-free asset to a broad range of counterparties that extends beyond banks, thus strengthening the floor on money market rates more generally. The counterpart to this facility in the UK is our ability to issue Bank of England bills, though thus far we haven't had the need to do so: since we began paying Bank Rate on all reserves in 2009 the wedge between overnight unsecured money market rates and Bank rate has averaged 4bps, and the standard deviation also been 4bps (Chart 6). Another example of changing the way we operate was our decision in 2014 to grant broker dealers access to reserve accounts at the Bank of England for the first time.

Second, empowered by strengthened regulatory frameworks and resolution regimes, we have reaffirmed our commitment to abide by Bagehot's 19th century advice that the best way to avoid a panic is to "lend freely and vigorously...on all good banking securities." For example, shortly after the result of the UK's referendum on EU membership was declared we made clear that banks already had collateral positioned with us such that they could borrow more than £250bn, and announced that our regular liquidity auctions would continue to run on a weekly basis throughout the summer. Coupled with banks' own strong internal liquidity positions, this has helped ensure the smooth functioning of money markets. And overnight market rates have stayed close to Bank Rate throughout the period since the referendum.

Third, we have taken steps to ensure that the vital infrastructure of money markets continues to remain effective. The work on risk-free benchmark rates being undertaken by both the Federal Reserve and the Bank of England is a good example of this. Building on recommendations made by the FSB³ – which drew on the findings of a market practitioners group chaired by Darell – both central banks have convened working groups of market participants with the aim of identifying benchmarks of nearly risk-free reference rates that could sit alongside Libor.⁴ And both have taken steps to improve the resilience and coverage of overnight unsecured benchmark rates – the Bank of England by taking over the administration and reform of SONIA⁵, and the Fed by overseeing the creation of the Overnight Bank Funding Rate. Such benchmarks are a vital means of assessing the pass-through efficiency of changes in policy rates – meaning Darell and Arvind will continue to be able to write papers on the topic long into the future.

Pass-through beyond money markets

Let me turn briefly to pass-through beyond money market rates. Deep structural forces affecting savings and investment preferences have combined with the ongoing legacy of the financial crisis to push the interest rate required to keep our economies in balance much lower than historical experience.

³ Reforming Major Interest Rate Benchmarks – July 2014 http://www.fsb.org/wp-content/uploads/r_140722.pdf

⁴ In the US, this is the Alternative Reference Rates Committee (ARRC). In the UK it is the Working Group on Sterling Risk-Free Reference Rates.

⁵ SONIA is the weighted average of unsecured brokered transactions, and it is the main reference rate in OIS contracts. Current daily volumes are around £7-10bn, down from around £25bn before the financial crisis. In July 2015 the Bank announced its plans to reform SONIA, including by broadening its coverage to encompass overnight unsecured transactions negotiated bilaterally as well as those arranged via brokers. For more information see <http://www.bankofengland.co.uk/markets/Pages/benchmarks/soniareform.aspx>.

The resulting proximity of policy rates to what was once known as the zero lower bound has important implications for the pass-through of monetary policy. Specifically, once household and business deposit rates have reached a very low level, it becomes difficult for banks to reduce them further. Recent international experience seems to bear this out – Chart 7 shows that pass-through to retail deposit rates tends to be weaker when risk-free rates are very low. As a result, in order to protect their margins banks may not reduce the rate they charge on lending, thus dampening the transmission of monetary policy.

The MPC was acutely aware of this when it decided at the beginning of this month to reduce Bank Rate to 0.25%. In order to reinforce the transmission of this change we also launched a Term Funding Scheme (TFS) through which central bank reserves will be lent to banks and building societies for four years. Should they maintain their lending to the real economy, the rate they will pay over this period will be Bank Rate. For each 1% that net lending by an institution falls, the cost of TFS funding will rise by 5bps to a maximum of 25bps. By tethering banks' term funding costs more closely to our official policy rate, this should create the capacity for them to pass the reduction in that rate through to households and businesses, thus strengthening the transmission to the real economy.

Since the MPC's decision we have published further documentation, technical detail and guidelines for firms considering using this facility. We are now open to applications, and the scheme will be available to be drawn upon from the middle of September.

Conclusion

Let me summarise. Darell and Arvind's paper draws attention to some very important issues, namely the decrease in competitive forces and increase in frictions in money markets, which work to reduce the pass-through efficiency of the Federal Reserve's monetary policy setting. And the behaviour of the index of dispersion of money market rates that they have created provides evidence that these developments are at least in part due to post-crisis changes in the regulatory framework.

Taking into account the improved resilience of the financial system, these regulatory changes are net beneficial to society, so they are not going to be rolled back. However, policymakers can and should be willing to attenuate some of their unintended consequences, and be open to challenge on their design.

As participants in money markets, central banks should be open to new ways to enhance pass-through efficiency by showing flexibility in their implementation of monetary policy. The Fed's RRP does this by making a risk-free asset available to a wider range of counterparties than would ordinarily be the case. And the Bank of England's recently launched TFS will help the pass-through of very low levels of Bank Rate to the rates faced by households and businesses in the real economy. Central banks can also contribute to the

function of money markets more broadly, by being willing to act early to address potential liquidity needs, and to support money market infrastructure more generally.

I'll end with a word on central banks' "footprint." Many of the developments raised in the paper and that will be discussed over the course of this conference have been a response to the needs of the day: having more reserves in the system is a reflection of the monetary policy stance required by economic developments; the leverage ratio has been developed as a part of the response to failure of the pre-crisis capital framework; and our intervention in risk-free benchmark rates is intended to avoid a co-ordination failure in which the most appropriate and robust benchmarks would not be adopted by the market.

So while it is true to say that central banks' footprint in money markets is larger now than in the days prior to the crisis, this has been out of necessity rather than design. As a tribe, central bankers retain a strong belief in financial markets' ability to facilitate price discovery, allocate capital efficiently, and provide useful signals about the macro economy and financial stability.

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