Staff Working Paper No. 800

The cost of clearing fragmentation

Evangelos Benos, Wenqian Huang, Albert Menkveld and Michalis Vasio

May 2019
Staff Working Paper No. 800

The cost of clearing fragmentation

Evangelos Benos, (1) Wenqian Huang, (2) Albert Menkveld (3) and Michalis Vasios (4)

Abstract

Fragmenting clearing across multiple central counter-parties (CCPs) is costly. This is because dealers providing liquidity globally, cannot net trades cleared in different CCPs and this increases their collateral costs. These costs are then passed on to their clients through price distortions which take the form of a price differential (basis) when the same products are cleared in different CCPs. Using proprietary data, we document an economically significant CCP basis for dollar swap contracts cleared both at the Chicago Mercantile Exchange (CME) and the London Clearing House (LCH) and provide empirical evidence consistent with a collateral cost explanation of this basis.

Key words: Central clearing, CCP basis, collateral, fragmentation.

JEL classification: G10, G12, G14.

---

(1) Bank of England. Email: evangelos.benos@bankofengland.co.uk
(2) Bank for International Settlements. Email: wenqian.huang@bis.org
(3) VU Amsterdam. Email: albertjmenkveld@gmail.com
(4) Norges Bank Investment Management. Email: michalis.v@gmail.com

The views expressed in this paper are those of the authors, and not necessarily those of the Bank of England or its committees or the Bank for International Settlements or Norges Bank Investment Management. Michalis Vasios has worked on this paper while he was at the Bank of England.

The Bank’s working paper series can be found at www.bankofengland.co.uk/working-paper/staff-working-papers

Bank of England, Threadneedle Street, London, EC2R 8AH
Email publications@bankofengland.co.uk

© Bank of England 2019
ISSN 1749-9135 (on-line)
1 Introduction

A key element of the G-20 post-financial crisis derivatives reform agenda, has been the mandate for centralized clearing of a wide range of OTC-traded derivatives. This has generated considerable policy and academic discussion on the optimal shape and form of clearing arrangements. Much of this discussion has centered around the netting opportunities associated with various clearing arrangements and the potential to economize on collateral (e.g. Sidanius and Zikes (2012)). In this respect, there appears to be consensus that, given a certain amount of central clearing, it is optimal, from a collateral-saving perspective, to concentrate activity in just one CCP (Duffie and Zhu (2011)). In reality however, clearing is fragmented with multiple clearing houses operating within and across jurisdictions, often clearing the same or similar derivatives contracts. Examples include dollar interest rate swap (IRS) contracts being cleared in both the Chicago Mercantile Exchange (CME) and the London Clearing House (LCH), euro swaps being cleared in LCH and Eurex Exchange in Frankfurt and Japanese yen contracts being cleared in LCH and the Japan Securities Clearing Corporation (JSCC). What the implications of this fragmentation in the clearing landscape are, is an open and policy-relevant question.

This paper sheds light on this question by providing direct evidence of the costs associated with fragmentation in clearing. In doing this, we theoretically argue, and empirically document, that fragmentation in clearing gives rise to economically significant price distortions, which become visible when the same contracts are cleared by different CCPs. These distortions reflect dealers’ collateral costs and represent a real cost to market end-users.

In particular, we document that dollar-denominated swap contracts cleared in CME, trade at a premium relative to the exact same contracts cleared in LCH. This price differential - termed here the CME-LCH basis - varies by contract maturity and for the 5-year swap contract it fluctuates, during our sample period, between 2-4bps. Given that outstanding notional amounts in the dollar swap market are in the trillions and daily trading
volumes in the tens of billions of dollars, this is an economically significant effect. Such price differentials are not unique to CME and LCH. They exist among many contracts being cleared in multiple CCPs and have been known for some time to market practitioners. However, to our knowledge, they have not been previously formally studied.

As such, we first provide a formal explanation for the CCP basis using a variation of the dynamic inventory management model presented in Foucault et al. (2013). The intuition as to why the basis arises is as follows: Due to the global nature of OTC derivatives markets, major dealers act as liquidity providers across jurisdictions, meaning that their client trades are cleared in multiple CCPs. This is especially true if clients in a particular jurisdiction only tend to access their local CCP. Thus, the netting opportunities for dealers’ overall portfolios are reduced. For example, a dealer selling a USD swap contract to a US client and simultaneously buying the same contract from a European client, cannot offset these two exposures if the two trades are cleared separately in CME and LCH respectively. This reduction in netting opportunities increases dealers’ collateral requirement as they are forced to pledge collateral with each CCP. More generally, the more imbalanced dealers’ inventories in each CCP are, the more collateral they will need to pledge. And while such imbalances will typically fluctuate over time and often be negligible, there may also be more fundamental reasons for client flow in a given jurisdiction to be consistently directional and thus for these imbalances to be persistent. This increased collateral requirement then represents for dealers an unavoidable, if variable, cost.

To break even, dealers may quote higher (lower) prices, where they are faced with buy (sell) client flow, than they would if all client flow was concentrated in one CCP and netting opportunities were maximized. Importantly, while this effect may be present in any contracts that are part of the same netting set, it becomes clearly visible when the exact

---


2This appears to be the case for example in the US where anecdotal evidence suggests that banks issuing long-term fixed-rate mortgages hedge this exposure in the local dollar swap market thus creating a permanent buy flow for dollar swaps that are cleared on CME.
same contract is cleared in two different CCPs. In this case, it manifests itself as a price differential, for the contract, across the two CCPs. Furthermore, this differential cannot be arbitraged away by simultaneously buying in the CCP where the price is low and selling where it is high, because these two trades would be subject to collateral requirements and therefore would be costly to execute. The same argument would explain to a large extent why market participants don’t simply execute their trades where prices are keener. Since most market participants’ portfolios typically consist of both long and short positions in contracts belonging to the same netting set, to exploit the CCP price differential they would have to split the long and short positions of their portfolios across jurisdictions, which would attract additional collateral. Market participants have therefore a strong incentive to clear all their trades in one CCP and minimize their collateral cost, despite having to bear the associated CCP basis cost.

Overall, our intuition is very similar to that of Ho and Stoll (1981) and Hendershott and Menkveld (2014) where risk-averse dealers adjust their mid-quotes to create an imbalance in client flow that reduces their inventory and thus their overall risk exposure. Our model is only different in that dealers manage two inventories (one for each CCP) instead of one, and that, being risk neutral, their only cost stems from the required collateral that they need to pledge with the CCPs.

Our model gives rise to a number of testable hypotheses regarding the dollar swap CME-LCH basis.

- First, since the basis allows dealers to recoup their collateral costs, our model predicts that it will respond positively to the amount of collateral pledged by swap dealers.

- Second, the basis will be lower in the presence of more sophisticated market participants who are flexible to choose where to clear their trades. In the presence of a basis, these market participants can clear in the CCP where dealers quote the better price. Thus, these clients’ trades will likely be reducing dealers’ inventory imbalances
and therefore the observed CCP basis.

- Third, the CCP basis should respond positively to changes of the unit cost of collateral funding. Collateral is expensive for dealers only to the extent that they pay interest to obtain it. Thus, the higher the collateral unit cost, the higher dealers’ total cost and the greater their incentive to minimize their inventory imbalances by quoting more aggressively in each CCP.

- Finally, since dealers recoup their collateral costs by quoting a higher price for dollars swaps on CME and a lower one on LCH, we would expect that client buy (sell) flow in dollar swaps on LCH, would lead to a decrease (increase) of the CME-LCH basis.

We test these hypotheses using proprietary transactional data from LCH’s SwapClear service, from January 2014 to end June 2016. The data includes transactions in all products that are part of the SwapClear netting set, namely interest rate swaps (IRSs), forward rate agreements (FRAs) and overnight index swaps (OISs), in the major currencies. An important feature of our data is that it identifies counterparties, which allows us to isolate dealers’ and clients’ activity and also identify non-dealer banks who can flexibly clear their contracts in the CCP of their choosing. We also use data on the house account amounts of collateral pledged with LCH by the participating dealers.

We estimate time series specifications, as well as a vector auto-regression (VARX) model, to examine dynamic effects between our variables of interest. We find broad support in the data for the hypotheses implied by our model. Dealers’ amount of pledged collateral, along with dealer funding costs, correlate positively and significantly with the CME-LCH basis whereas the proportion of trading volume in SwapClear products executed by non-dealer banks correlates negatively and significantly. Furthermore, the VARX specification results show that client net (i.e. buy minus sell) volume in dollar IRS contracts leads to a decrease in the CME-LCH basis.

3USD, euro, and GBP.
The paper proceeds as follows: In the next section we briefly describe the related literature, in Section 3 we provide details on the institutional framework of centralized clearing, in Section 4 we present our model and in Section 5 we describe the data, the empirical specifications and present the results. All proofs related to the model, are included in the Appendix.

2 Literature Review

This paper is closely related to the literature on the role of collateral, especially in the context of central clearing. Duffie and Zhu (2011) compare the netting benefits between bilateral clearing, where exposures across assets with any one counterparty can be netted, and central clearing, where exposures across counterparties in only one asset class can be netted. The authors show that, to achieve the maximum netting benefits with central clearing, it is optimal to have one CCP in one asset class. Menkveld (2017) extends their framework by adding tail risk. He uses this extended framework to identify crowding in clearing member positions as an “overlooked” risk for CCPs. Garratt and Zimmerman (2018) extend the Duffie and Zhu (2011) methodology to more realistic financial networks for which they obtain exact conditions under which central clearing alters the expectation and variance of exposures. These authors also conclude that once clearing is introduced, it is optimal to novate all exposures via a single CCP.

Duffie et al. (2015) empirically estimate the impact of central clearing on collateral demand. Based on bilateral exposure data in credit default swaps (CDS), the authors find that central clearing can lower overall collateral demand when there is no substantial clearing fragmentation. Corroborating this literature, our paper is the first to empirically document how fragmentation in clearing, and the associated break up of netting sets, increases collateral costs and distorts asset prices by giving rise to a CCP basis.

Our paper also contributes to the literature on dynamic inventory management. Our
setup is similar to Ho and Stoll (1981) and Foucault et al. (2013) who analyze dealers’ optimal dynamic trading strategies in the presence of inventory holding costs. Our paper differs in that dealers are risk neutral, so that inventory risk is not a concern to them, but are faced with inventory holding costs, in the form of collateral, which are a function of inventory size. These collateral costs result from fragmentation in contract clearing as discussed above. As such, our paper is the first in the literature to model dealers’ dynamic inventory management in a fragmented clearing landscape.

Our paper also provides new evidence on the asset pricing implications of dealers’ inventory holding costs. Garleanu and Pedersen (2011) provide theoretical foundations by studying the asset pricing implications of margin constraints. Their margin-based CAPM predicts that there should be price differences between securities with identical cash-flows but different margins. There is also evidence that indeed dealers price in their inventory holding costs in various markets such as equities (see e.g. Naik and Yadav, 2003; Hendershot and Menkveld, 2014), US Treasuries (see e.g. Fleming and Rosenberg, 2008), and corporate bonds (see e.g. Randall, 2015; Schultz, 2017; Friewald and Nagler, 2018).

More recently, there has been additional evidence of dealers’ balance sheet constraints inducing price effects in FX and derivatives markets, largely as a result of binding regulatory constraints. For instance, Du et al. (2018) show that constraints on banks’ balanced sheets induced by capital regulation play a role in sustaining deviations from the Covered Interest Parity (CIP). Klinger and Sundaresan (2019) and Boyarchenko et al. (2018) attribute to the same cause the fact that swap spreads have been low since the financial crisis and have recently turned negative for some contract maturities. Cenedese et al. (2018) show that swap contracts that are centrally cleared, trade at a discount relative to bilaterally cleared ones due to the lower risk weights that the former carry. More generally, recent evidence also suggests that dealers’ balance sheet constraints can affect their
trading activity and can lead them to ration their balance sheet capacity. For instance, Kotidis and van Horen (2018) document reduced Sterling repo dealer volumes and Benos and Zikes (2018) reduced gilt inter-dealer volumes as a result of capacity constraints in dealers’ balance sheets induced by regulation and elevated funding costs respectively. Similarly, Acosta-Smith et al. (2018) find that balance sheet constrained dealers, acting as clearing members of CCPs, reduce the number of new clearing clients and also reduce the number of transactions that they clear for their existing clients. Overall, our results corroborate this literature and show that dealers’ inventory holding costs also depend on the shape and form of clearing arrangements.

3 Institutional Framework

3.1 Central clearing

Although clearing houses (or central counterparties - CCPs) have existed for a long time, they only recently emerged as an important pillar of the regulation for the financial system. In 2009, G20 Leaders laid down central clearing requirements for standardized OTC derivatives as part of their broader agenda for making financial markets safer. This has rendered CCPs systemically important entities in the post-crisis financial market landscape.

CCPs intermediate between the counterparties of a bilateral trade and become the buyer of the original seller, and the seller of the original buyer. By converting the bilateral exposures to exposures against the CCP, the original parties protect themselves against counterparty risk, i.e. the risk of losses due to counterparty default.

The reduction in counterparty risk comes at a cost, as CCPs require clearing members to post collateral, mostly initial margin, daily, or sometimes even intra-day, to cover potential

---

5One of the first U.S. clearing houses was the New York Clearing House, which was founded in 1853 to streamline the clearing and settling of checks.
losses in the event of a clearing member default.\textsuperscript{6} CCPs calculate initial margin using risk-based models, such as Value-at-Risk (VaR) or Standard Portfolio Analysis of Risk (SPAN). The calculated values of initial margin are a function of the riskiness and size of a given portfolio. Margined portfolios may include contracts of various currencies and maturities and even contracts of different, but related, products. This means that any offsetting exposures in these contracts are netted prior to being margined and the contracts for which this is possible constitute a netting set. For example, LCH’s SwapClear service includes IRS, FRA and OIS contracts in the same netting set. However, any positions in different services within the same CCP (i.e. positions that are not in the same netting set) or any positions in the same contracts held in different CCPs cannot be netted.

The G20 objective for more central clearing has been implemented in U.S. and Europe through the Dodd-Frank Act and the European Market Infrastructure Regulation (EMIR; regulation No 648/2012), respectively. In the U.S, centralized clearing of certain standardized IRS contracts has been mandatory for U.S. persons since March 2013. The EMIR clearing obligation was phased-in in June 2016 and required European counterparties of certain OTC interest rate derivatives to clear their transactions through an authorized central counterparty. As a result of the clearing obligation, the centrally-cleared segment of interest rate derivatives dominates trading during our sample period.\textsuperscript{7}

3.2 Clearing fragmentation in the IRS market

Clearing in the USD-denominated segment of the IRS market is dominated by two clearing houses, the London Clearing House (LCH) and the Chicago Mercantile Exchange Clearing (CME). LCH started clearing plain vanilla IRS, through its SwapClear platform, in 1999.\textsuperscript{6}

\textsuperscript{6}Clearing members are also required to make default fund contributions, which contribute towards the CCP’s mutualized loss sharing arrangements. However, default fund contributions account for only a fraction (e.g., 5-6%) of the total funds available to the CCP in the event of a default. An example of the breakdown of a CCP’s clearing member default resources, the so-called default waterfall, can be found here: \url{http://www.lch.com/documents/731485/762506/2_default_waterfall_ltd_0.35_150529/}.

\textsuperscript{7}For example, Cenedese et al. (2018) report that in 2015 90\% of dollar swap volumes and 85\% of trades are centrally cleared.
It supports clearing in 18 currencies, some with tenors up to 50 years, while its services are used by almost 100 financial institutions from over 30 countries, including all major dealers. CME begun clearing over-the-counter IRS in 2010. Its product offering includes 19 currencies and has about 80 clearing members. During our sample period of January 2014 to June 2016, LCH accounted for approximately 55% of the dollar IRS volume cleared by these two CCPs, with the rest being cleared by CME.

4 A model for the CCP basis

Our model is based on the inventory holding cost model in Foucault et al. (2013). A representative and competitive dealer makes markets for a single type of derivative contract (such as a plain vanilla fixed-to-floating IRS). There are infinite time periods. At each period $t$, a unit mass of liquidity traders would like to trade the contract. Crucially, the contract is mandated to be cleared in two different CCPs, meaning that a contract exposure in one CCP cannot be netted against a contract exposure in the other. The model details are as follows:

**Asset:** The derivative contract has an infinitely long maturity. The contract’s underlying asset has a fundamental value $\mu_t$ (e.g. the fixed rate of an IRS contract), which follows a martingale process that is common knowledge:

$$\mu_t = \mu_{t-1} + \epsilon_t \quad \epsilon_t \sim (0, \sigma^2)$$

The contract is mandated to be cleared in two different CCPs (A and B) and in CCP $i$, the contract is quoted and traded at price $p^i_t$, which can be different from the fundamental value. Quoted prices are different depending on whether liquidity traders are buying or selling and the mid-quote $m^i_t$ is defined as the average of the buy and sell quoted prices at time $t$. The time $t$ mark-to-market value of the contract traded in CCP $i$, is the first
difference of execution prices ($p_t^i - p_{t-1}^i$), which represents the one-period gains or losses associated with that contract.

**Liquidity traders:** There is a unit mass of liquidity traders. A proportion $\delta$ of them are price-sensitive: they place a buy order in the CCP with the best price if $m_t^i < \mu_t$ and a sell order in the CCP with the best price if $m_t^i > \mu_t$ where $i$ denotes the CCP with the best available price. If $m_t^A = m_t^B = \mu_t$, they do not trade. That is, price-sensitive liquidity traders have access to and can trade flexibly across both CCPs. The remaining $1 - \delta$ proportion of liquidity traders are equally split between CCPs $A$ and $B$ and are price-insensitive. This means that they always trade, regardless of price levels, and can only do so at their local CCP. In CCP $A$, a proportion $\pi$ of them places a buy order and the remaining $1 - \pi$ places a sell order. The opposite occurs in CCP $B$ where $\pi$ of them place a sell order and $1 - \pi$ place a buy order. Hence, the price-insensitive buy-sell order flow is balanced across CCPs but not within each individual CCP. The net price-insensitive order flow in CCP $A$ is $\frac{1}{2}(1 - \delta)(2\pi - 1)$ and that in CCP $B$ is $\frac{1}{2}(1 - \delta)(1 - 2\pi)$. Lemma 1 in the Appendix summarizes the total (i.e. both price-sensitive and price-insensitive) expected flow $E[d_t^i]$ by liquidity traders in each CCP under all price configurations. $^8$

**Dealer:** There is a representative and competitive dealer who is risk neutral and who always responds to liquidity traders’ requests to trade. The dealer is active in both CCPs but crucially, she cannot net any offsetting exposures across CCPs. The end-of-period $t$ dealer’s position in CCP $i$ is $z_{t+1}^i$ and the dealer’s total position across CCPs is $z_{t+1} = z_{t+1}^A + z_{t+1}^B$. $^9$ Being competitive, the dealer takes $p_t^i$ as given and chooses the number of contracts $q_t^i$ that she is willing to supply in each CCP at a given price. $^10$ Hence, after selling $q_t^i$ contracts in CCP $i$, the dealer’s inventory in that CCP, at the end of period $t$, is

---

$^8$For tractability, we assume that liquidity traders do not bear collateral costs. In reality of course they do and, if anything, this would exacerbate the CCP basis as it would be costly to arbitrage it away.

$^9$The dealer has a long (short) position in CCP $i$ when $z_t^i > 0$ ($z_t^i < 0$). In the case of IRS contracts, the dealer pays the fixed and receives the floating rate when $z_t^i > 0$.

$^{10}$$q_t^i > 0$ ($q_t^i < 0$) means the dealer is selling (buying) swap contracts in CCP $i$ at time $t$
\[ z^i_{t+1} = z^i_t - q^i_t. \] The position with each CCP attracts a collateral of \( \sigma|z^i_{t+1}| \) where \( \sigma \) is the risk of the contract. The dealer must fund each unit of collateral at cost \( \phi \). Given that the dealer cannot net positions across CCPs, the total collateral cost of the dealer across CCPs is:

\[ \phi \sigma|z^A_{t+1}| + \phi \sigma|z^B_{t+1}| \]

**Market clearing:** Let \( d^i_t \) denote the total liquidity demand in CCP \( i \). Markets clear in each CCP when \( q^A_t = d^A_t \) and \( q^B_t = d^B_t \). The key variables of the model along with the market clearing conditions are summarized in the time-line below:

\[ p_t = f(\mu_t, z_t, q_t) \quad p_{t+1} = f(\mu_{t+1}, z_{t+1}, q_{t+1}) \]

\[ q_t = d_t \quad q_{t+1} = d_{t+1} \]

**The dealer’s problem**

At the end of time period \( t \), the dealer’s wealth is the sum of the mark-to-market values of her \( t + 1 \) inventories in the two CCPs, minus the collateral cost associated with each inventory:

\[
\omega_{t+1} = \frac{(p^A_{t+1} - p^A_t)z^A_{t+1}}{\text{Mark-to-market value of } z^A_{t+1}} + \frac{(p^B_{t+1} - p^B_t)z^B_{t+1}}{\text{Mark-to-market value of } z^B_{t+1}} - \phi \sigma|z^A_{t+1}| - \phi \sigma|z^B_{t+1}| \]

\[ = (p^A_{t+1} - p^A_t)(z^A_t - q^A_t) + (p^B_{t+1} - p^B_t)(z^B_t - q^B_t) - \phi \sigma|z^A_t - q^A_t| - \phi \sigma|z^B_t - q^B_t| \]

At time \( t \) the dealer maximizes, with respect to the quantity of contracts sold \( q^i_t \), her next-period total wealth. Being risk-neutral, the dealer solves:

\[
\max_{q^A_t, q^B_t} E[\omega_{t+1}] \]
The first order conditions of this problem yield the relationship between current and expected execution prices:

$$p^A_t = \begin{cases} E_t[p^A_{t+1}] + \phi \sigma, & \text{if } q^A_t > z^A_t \rightarrow z^A_{t+1} < 0 \\ E_t[p^A_{t+1}], & \text{if } q^A_t = z^A_t \rightarrow z^A_{t+1} = 0 \\ E_t[p^A_{t+1}] - \phi \sigma, & \text{if } q^A_t < z^A_t \rightarrow z^A_{t+1} > 0 \end{cases}$$  \hspace{1cm} (3)

$$p^B_t = \begin{cases} E_t[p^B_{t+1}] + \phi \sigma, & \text{if } q^B_t > z^B_t \rightarrow z^B_{t+1} < 0 \\ E_t[p^B_{t+1}], & \text{if } q^B_t = z^B_t \rightarrow z^B_{t+1} = 0 \\ E_t[p^B_{t+1}] - \phi \sigma, & \text{if } q^B_t < z^B_t \rightarrow z^B_{t+1} > 0 \end{cases}$$  \hspace{1cm} (4)

**Rational expectations equilibrium and the CCP basis**

In the above setup, the representative dealer chooses the quantities $q^i_t$ of contracts to be sold (or bought) in each CCP given current inventory levels $z^i_t$, prevailing execution prices $p^i_t$ and the fundamental asset price $\mu_t$. The total quantity of the contract being supplied feeds back into execution prices so that quantities and prices are jointly determined. Proposition 1 summarizes the equilibrium relationship between these variables in each CCP.

**Proposition 1.** **Equilibrium price and inventory relationships in each CCP**

(i) **Execution price equilibrium relationship**

$$\begin{bmatrix} p^A_t \\ p^B_t \end{bmatrix} = \begin{cases} \begin{bmatrix} \mu_t \\ \mu_t \\ \mu_t \\ \mu_t \end{bmatrix} - \frac{\phi \sigma}{\delta} \begin{bmatrix} 1 \\ 1 \\ 1 \\ 0 \end{bmatrix} \begin{bmatrix} z^A_{t+1} \\ z^B_{t+1} \\ z^A_{t+1} \\ z^B_{t+1} \end{bmatrix}, & \text{if } z^A_{t+1}z^B_{t+1} > 0 \\ \begin{bmatrix} \mu_t \\ \mu_t \\ \mu_t \\ \mu_t \end{bmatrix} - \frac{\phi \sigma}{\delta - (1-\delta)(2\pi-1)} \begin{bmatrix} 1 \\ 1 \\ -1 \\ -1 \end{bmatrix} \begin{bmatrix} z^A_{t+1} \\ z^B_{t+1} \\ z^A_{t+1} \\ z^B_{t+1} \end{bmatrix}, & \text{if } z^A_{t+1}z^B_{t+1} = 0 \\ \begin{bmatrix} \mu_t \\ \mu_t \\ \mu_t \\ \mu_t \end{bmatrix} - \frac{\phi \sigma}{\delta - (1-\delta)(2\pi-1)} \begin{bmatrix} 1 \\ 1 \\ 1 \\ 1 \end{bmatrix} \begin{bmatrix} z^A_{t+1} \\ z^B_{t+1} \\ z^A_{t+1} \\ z^B_{t+1} \end{bmatrix}, & \text{if } z^A_{t+1}z^B_{t+1} < 0 \end{cases}$$  \hspace{1cm} (5)
(ii) Mid-quote equilibrium relationship

\[
\begin{bmatrix}
m_t^A \\
m_t^B \\
\end{bmatrix} = \begin{cases} 
\begin{bmatrix} 
\mu_t & -\frac{\phi \sigma}{\delta} \\
1 & 1 \\
\end{bmatrix} \begin{bmatrix} 
z_t^A \\
z_t^B \\
\end{bmatrix}, & \text{if } z_{t+1}^A z_{t+1}^B > 0 \\
\begin{bmatrix} 
\mu_t & \frac{\phi \sigma}{\delta} \\
1 & 0 \\
0 & 1 \\
\end{bmatrix} \begin{bmatrix} 
z_t^A \\
z_t^B \\
z_t^A \\
\end{bmatrix}, & \text{if } z_{t+1}^A z_{t+1}^B = 0 \\
\begin{bmatrix} 
\mu_t & -\frac{\phi \sigma}{\delta-|(1-\delta)(2\pi-1)|} \\
1 & -1 \\
-1 & 1 \\
\end{bmatrix} \begin{bmatrix} 
z_t^A \\
z_t^B \\
z_t^A \\
\end{bmatrix}, & \text{if } z_{t+1}^A z_{t+1}^B < 0 
\end{cases}
\]

**Proof.** See the Appendix.

The above proposition suggests that when the dealer’s inventories in two CCPs are in the same direction, i.e., \( z_{t+1}^A z_{t+1}^B > 0 \), the prices and mid-quotes in the two CCPs are both either higher or lower than the fundamental asset value \( \mu \) depending whether the dealer wishes to induce buy or sell flow by liquidity traders in the two CCPs. Furthermore, the prices across CCPs both depend on the total amount of inventory \( z_{t+1}^A + z_{t+1}^B \), rather than the local amount, and for this reason they are the same. This is because the marginal cost of collateral is constant i.e. independent of the total collateral amount. Similarly, when the dealer has zero inventory in at least one CCP, i.e., \( z_{t+1}^A z_{t+1}^B = 0 \), the price in that CCP equals the fundamental value \( \mu \) as there is no need to induce liquidity trader flow. The price in the other CCP, however, will depend on the dealer’s inventory there. Hence, prices and mid-quotes across CCPs will not be the same.

The most interesting case arises when the dealer has opposite exposures in the two CCPs. Suppose for example that \( z_t^B < q_t^B = q_t^A < z_t^A \) so that \( z_{t+1}^A > 0 \) and \( z_{t+1}^B < 0 \) i.e. the dealer is expected to end up with a positive (negative) position in CCP A (B). In that case, the equilibrium expressions for the mid-quotes in each CCP suggest that \( m_t^A < \mu_t \) and \( m_t^B > \mu_t \) i.e., the mid-quote in CCP A (B) will be lower (higher) than the fundamental
value. In other words, mid-quotes across CCPs will be different, giving rise to a CCP basis. This is summarized in Proposition 2.

**Proposition 2. CCP basis**

The CCP basis is defined as the difference between the mid-quotes across the two CCPs.

\[
\text{Basis}_t \equiv m_t^B - m_t^A = \begin{cases} 
\frac{2\phi}{\delta - |(1-\delta)(2\pi-1)|} (z_t^A - z_t^B), & \text{if } z_{t+1}^A z_{t+1}^B < 0 \\
\frac{\phi}{\delta} z_t^A, & \text{if } z_{t+1}^A \neq 0, z_{t+1}^B = 0 \\
\frac{\phi}{\delta} z_t^B, & \text{if } z_{t+1}^A = 0, z_{t+1}^B \neq 0 \\
0, & \text{if } z_{t+1}^A z_{t+1}^B > 0
\end{cases}
\]  

(7)

**Proof.** Take the difference between the two mid-quotes in Equation (6).

From expression (7) one can see that the basis is an increasing function of the dealer’s inventory imbalance in each CCP \( z_t^A - z_t^B \), the riskiness of the asset \( \sigma \), the unit cost of collateral \( \phi \) and the amount of price-insensitive liquidity traders’ directional volume \( \pi \). On the other hand, it is negatively related to the fraction of price-sensitive liquidity traders \( \delta \).

## 5 Empirical Analysis

### 5.1 Data

For our empirical analysis we use a variety of data primarily obtained from LCH and CME, covering the period between 1 January 2014 and 30 June 2016. To construct the CME-LCH basis in the dollar interest rate swap market, we obtain from both clearing houses the yield curves that they use to price their derivatives contracts. These curves are obtained on a
daily frequency for the full sample period and, as we explain in Section 5.2, they reflect dealers’ quoted prices for trades cleared with each CCP.

The main body of our data consists of transactions on the full range of products cleared by LCH’s SwapClear service, which includes interest rate swaps (IRSs), forward rate agreements (FRAs) and Overnight Index Swaps (OISs), in three main currencies (Dollar, euro and Pound Sterling). All these contracts belong to the same netting set, meaning that a position in one type of contract can be netted against an offsetting position in another contract. LCH has a market share in excess of 90% across all interest rate derivatives in Dollars, Euros and Pound Sterling, and clears approximately 55% of the USD IRS volumes with the rest being cleared by CME.11 Furthermore, these three currencies represent about 80% of SwapClear volumes.12 LCH’s services are used by almost 100 financial institutions from over 30 countries, including all major dealers. Thus, the LCH data captures the vast majority of activity in interest rate derivatives. The data contains information on contract and trade characteristics such as contract maturity, execution and effective dates, notional amounts traded, execution price (i.e., the contract fixed rate) but also on counterparty identities. This allows us to identify individual dealer activity and also to observe the dealer-to-client segment of the market.13

In addition to the transactional data, we also utilize information on the daily amounts of initial margin posted by swap dealers on LCH. Initial margin is collected by LCH to cover losses in the event of a clearing member default and as such, it is calculated daily at the portfolio level using a filtered historical simulation approach.14

---

12 See https://www.lch.com/services/swapclear/volumes
13 We classify as dealers the financial institutions in the the list of 16 “Participating Dealers” used by the OTC Derivatives Supervisors Group, chaired by the New York Fed. For more details see: https://www.newyorkfed.org/markets/otc_derivatives_supervisors_group.html
14 LCH’s model uses 10 years of data to construct the empirical distribution of changes in portfolio values from which the potential loss distribution is calculated. For more details see http://www.swapclear.com/service/risk-management.html.
5.2 The CME-LCH Basis

The CME-LCH basis is the difference in the end-of-day settlement price, of dollar-denominated swap contracts with the same maturity, cleared by CME and LCH. Here we reconstruct the CME-LCH basis using the same raw data that the two clearing houses use to calculate end-of-day settlement prices.

At this point it is important to describe how dealers’ submitted data translate into a price differential in CCPs’ settlement prices. At the end of each day, dealers communicate to the CCPs their quoted swap fixed rates for a number of different maturities. The CCPs then take an average of these quoted prices for each maturity and use them to back out the “zero coupon” yield curve associated with these maturities. The risk-free rates for maturities for which dealers do not report swap price quotes, are interpolated from the extracted yield curve. The interpolated yield curve is then used to derive the settlement prices for any remaining maturities. Thus, any price differential in dealers’ quoted prices ultimately shows up in the CCPs’ settlement prices. The data we use to re-construct the Basis is the yield curve constructed by CCPs from dealers’ submitted quotes. We obtain these yield curves from both LCH and CME for each of the days in our sample period. From these yield curves, we calculate the IRS fixed rates using the standard swap pricing formula, applying the 3M/6M convention, whereby the floating payment is made every 3 months and the fixed payment every 6 months. Let \( k \in \{LCH, CME\} \) denote one of the two CCPs. Equating the present values of the fixed and floating payment streams for a T-year contract and for CCP \( k \), we have:

\[
2T \sum_{i=1}^{2T} \frac{R_{fixed,6M,k,t,i}}{2} (1 + \frac{R_{k,t,i}}{2})^i = 4T \sum_{j=1}^{4T} \frac{R_{floating,3M,k,t,j}}{4} (1 + \frac{R_{k,t,j}}{4})^j
\]  

(8)

where \( R_{fixed,6M,k,t} \) is the day \( t \) annualized fixed rate of CCP \( k \), \( R_{k,t,i} \) is the same-day annualized discount rate of period \( i \), extracted by CCP \( k \) (i.e, CCP \( k \)’s yield curve on day \( t \)) and
$R_{k,t,j}^{\text{Floating,3M}}$ is the period $j$ forward rate of CCP $k$, extracted from the CCP’s yield curve. Thus, the CME-LCH basis is the difference between the two CCP fixed rates:

$$
\text{CME – LCH Basis}_t \equiv R_{CME,t}^{\text{fixed,6M}} - R_{LCH,t}^{\text{fixed,6M}},
$$

(9)

In Figure 1 we plot the CCP basis, over our sample period, for seven different swap maturities and on a weekly frequency. As one can see, the basis fluctuates between 1bps and 7bps and is generally larger for longer maturity contracts. Furthermore, it substantially increases in size from June 2015.\(^{15}\)

**Figure 1**: The CME-LCH basis (in %) in dollar-denominated IRS contracts for various contract maturities. The maturity-specific basis is defined in equation (9). The time period is Jan 2014-Jun 2016.

---

\(^{15}\)The increase in the CCP basis could be associated with the phased-in implementation of the Basel III liquidity coverage ratio (LCR), which requires banks to hold high quality liquid asset (HQLA) against their estimated 30 days’ cash outflow. IM is counted as cash outflow with a penalization of 20%, i.e., 1 unit of IM counting as 1.2 units of cash outflow. The LCR requirement became effective from Jan 1, 2015 at 60% rate and rose to 70% in 2016. This has likely further increased the cost of IM for dealers. See [https://www.bis.org/bcbs/publ/d354.pdf](https://www.bis.org/bcbs/publ/d354.pdf).
5.3 Hypotheses

Our model for the CCP basis gives rise to a number of testable hypotheses. Equation (7) shows that when dealer outstanding inventories in each CCP are expected to be in the opposite direction (i.e., $z_{t+1}^A z_{t+1}^B < 0$), the basis is a function of the per unit cost of collateral $\phi$, asset volatility $\sigma$, the sum of expected outstanding inventories in the two CCPs $z_t^A - z_t^B$ and the fraction $\delta$ of market participants who are price-sensitive and can flexibly choose to clear in either CCP. Asset volatility times the outstanding dealer inventories is an approximation of the amount of collateral posted with each CCP, since, in practice, collateral (or initial margin) is typically calculated as the Value-at-Risk (VaR) of the dealer’s portfolio, which is a (multiplicative) function of the portfolio’s net notional and risk. Additionally, our model suggests that if clients trade in a direction that minimizes (increases) dealers’ imbalances, this will lead to a reduction (increase) in the CCP basis. Thus, with relation to our data, our model gives rise to the following testable hypotheses:

H1: The CME-LCH basis is increasing in dealers’ posted collateral with LCH.

H2: The CME-LCH basis is decreasing in the LCH volume share of price-sensitive participants who can clear flexibly in multiple CCPs.

H3: The CME-LCH basis is increasing in dealers’ funding costs.

H4: The CME-LCH basis is decreasing in client net buy volume in dollar swap contracts cleared in LCH.

Regarding the hypotheses that pertain to CCP activity and collateral posted, our model predicts that they should hold true for both LCH and CME. However, we cannot test for any effects on CME-cleared volumes and posted collateral since we only have data from LCH. Therefore, in what follows, we test the above hypotheses using our LCH data.

18
5.4 Determinants of the CME-LCH Basis

We next use our data to examine the determinants of the CME-LCH basis and also see whether the predictions of our model have empirical validity. We start by testing Hypotheses 1 - 3 using weekly time-series specifications. Our baseline time-series specification is:

\[ Basis_t = a + b \cdot Collateral_t + c \cdot Flex\_Ratio_t + d \cdot Libor\_Spread_t + u_t \]  

In this setup, \( Basis \) is the simple average of the end-of-week \( t \) value of the CME-LCH basis of each contract maturity as defined in equation (9). \( Collateral \) is either the aggregate initial margin posted on LCH by all dealers or, the absolute cumulative net volume transacted by dealers and their clients across the full range of SwapClear products. \( Flex\_Ratio \) is the fraction of dealer-to-client volume traded across SwapClear products by non-dealer banks and \( Libor\_Spread \) is the difference between the three-month Libor rate and the overnight federal funds rate.

The cumulative net volume transacted by dealers is an imperfect proxy for the size of the dealers’ aggregate inventory imbalance and is included as a robustness check. This variable is noisy both because we do not observe dealers’ initial positions and also because we do not observe contract expirations. We use the fraction of volume traded by non-dealer banks as a proxy for the amount traded by price-sensitive market participants who can clear flexibly in either CCP. We do this because all banks in our sample have access (through their subsidiaries) to both LCH and CME and thus can in principle clear through either CCP. This measure may not necessarily capture all market participants with access to both CCPs but it should account for the majority of flexible participants given that most non-bank entities (e.g. asset managers, hedge funds, etc.) typically only access (directly or indirectly) a single CCP.

Also, in our specification, both the dealer initial margin and the activity by non-dealer
banks pertain exclusively to LCH for which there is available data. In principle, the basis should also be a function of the collateral that the dealers post on CME as well as the activity of non-dealer banks that is cleared through this CCP. However, given that dealers try to maintain balanced positions across CCPs, we suspect that any changes in dealer collateral posted in LCH would be highly correlated with changes in collateral posted with CME, to the extent that dealers’ CME positions would be approximately offsetting to dealers’ LCH positions. Thus, the inclusion of LCH collateral alone in our empirical specification likely captures most of the effect induced by total collateral, posted across both CCPs. The same can be said about activity by flexible market participants. When the CCP basis widens, some of those participants who can clear flexibly will purchase swap contracts (in one CCP) and others will sell them, likely in the other CCP.

Table 1 shows summary statistics for the time-series variables used in the above specification. The aggregate CME-LCH basis fluctuates between 0.9-3.6 bps with an average of 1.7bps. Total collateral posted by dealers on SwapClear is between euro 7-13.8 billions with an average amount of euro 11 billion. Finally, the fraction of volume that all dealers trade with other banks is anywhere between 20%-60% with an average of 34%.

Table 1: Summary statistics of the variables used in specification (10). The aggregate CME-LCH basis (in bps) is the simple average of the maturity-specific bases defined in equation (9). IM is the aggregate initial margin posted with the SwapClear service of LCH by all dealers. AbsCumNetVlm is the absolute cumulative net dealer-to-client volume in all SwapClear products. Flex_Ratio is the fraction of volume across all SwapClear products that dealers transact with non-dealer banks. Libor_Spread is the difference between the three-month USD Libor rate and the overnight federal funds rate. All variables are weekly. The time period is January 2014 to June 2016.

<table>
<thead>
<tr>
<th>Variable</th>
<th>Mean</th>
<th>Std</th>
<th>Min</th>
<th>Max</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basis (bps)</td>
<td>1.72</td>
<td>.62</td>
<td>.95</td>
<td>3.62</td>
</tr>
<tr>
<td>IM (EUR bn)</td>
<td>11.06</td>
<td>1.80</td>
<td>7.11</td>
<td>13.75</td>
</tr>
<tr>
<td>AbsCumNetVlm (USD bn)</td>
<td>1834.94</td>
<td>843.39</td>
<td>8.28</td>
<td>3640.46</td>
</tr>
<tr>
<td>Flex_Ratio</td>
<td>.34</td>
<td>.10</td>
<td>.20</td>
<td>.60</td>
</tr>
<tr>
<td>Libor_Spread (%)</td>
<td>.07</td>
<td>.02</td>
<td>.04</td>
<td>.17</td>
</tr>
<tr>
<td>N</td>
<td>127</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 2 shows the estimation results. The predictions of our model are strongly supported in the data with all variables having the expected signs and being statistically...
significant. Both the amount of initial margin posted by dealers on LCH as well as their absolute cumulative net volume are positively associated with the CCP basis. When both variables enter the specification (column 7), then the cumulative volume variable loses its significance to the initial margin. This is because the initial margin is itself a function of dealer inventory. The coefficient on the ratio of volume transacted with non-dealer banks is negative and significant consistent with our model’s intuition that larger structural imbalances in flows should exacerbate the basis. Finally, the Libor spread is positively associated with the basis consistent with the notion that dealers use the basis to compensate their collateral costs. Importantly, these costs are not only a function of the actual amount of collateral that dealers need to post with LCH, but also of the unit cost of funding this collateral, as captured by the Libor spread. Overall, these results give broad support to the notion that the CCP basis is fundamentally a reflection of dealers’ collateral costs and at the same time a means of compensation against these costs as predicted by our model.

Table 2: Estimation results of the basis time-series model (10). The dependent variable is the CME-LCH basis defined in equation (9). IM is the aggregate dealer initial margin posted with LCH, AbsCumNetVlm is the absolute cumulative net dealer-to-client volume in all SwapClear products and Flex_Ratio is the fraction of volume across all SwapClear products that dealers transact with non-dealer banks. Libor_Spread is the difference between the three-month USD Libor rate and the overnight federal funds rate. Robust t-statistics are in parentheses. *, ** and *** denote significance at 10%, 5% and 1% respectively. The time period is January 2014 to June 2016.

<table>
<thead>
<tr>
<th></th>
<th>(1) basis</th>
<th>(2) basis</th>
<th>(3) basis</th>
<th>(4) basis</th>
<th>(5) basis</th>
<th>(6) basis</th>
<th>(7) basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>IM</td>
<td>0.1412***</td>
<td>0.1319***</td>
<td>0.1772***</td>
<td>0.1772***</td>
<td>(5.44)</td>
<td>(6.11)</td>
<td>(3.87)</td>
</tr>
<tr>
<td>AbsCumNetVlm</td>
<td>0.0002***</td>
<td>0.0002***</td>
<td>-0.0001</td>
<td>0.0002***</td>
<td>(4.82)</td>
<td>(5.45)</td>
<td>(-1.25)</td>
</tr>
<tr>
<td>Flex_Ratio</td>
<td>-1.9920***</td>
<td>-1.4049***</td>
<td>-1.3934***</td>
<td>-1.4764***</td>
<td>(-3.97)</td>
<td>(-3.36)</td>
<td>(-3.37)</td>
</tr>
<tr>
<td>Libor_Spread</td>
<td>17.1348***</td>
<td>16.7882***</td>
<td>18.7980***</td>
<td>15.7025***</td>
<td>(6.20)</td>
<td>(7.47)</td>
<td>(7.38)</td>
</tr>
<tr>
<td>cons</td>
<td>0.1545</td>
<td>1.3975***</td>
<td>2.3926***</td>
<td>0.5752***</td>
<td>0.5273**</td>
<td>0.5775</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(0.59)</td>
<td>(19.77)</td>
<td>(12.29)</td>
<td>(3.22)</td>
<td>(2.04)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>R²</td>
<td>0.170</td>
<td>0.056</td>
<td>0.094</td>
<td>0.236</td>
<td>0.456</td>
<td>0.398</td>
<td>0.462</td>
</tr>
<tr>
<td>N</td>
<td>127</td>
<td>127</td>
<td>127</td>
<td>127</td>
<td>127</td>
<td>127</td>
<td>127</td>
</tr>
</tbody>
</table>
5.5 Dynamic Effects of the CME-LCH Basis

In our model, dealers set higher (lower) prices where there is persistent client buy (sell) flow. They do this because they want to recoup the collateral costs associated with maintaining imbalanced inventories in each CCP. Thus, as stated in Hypothesis 4 above, our model predicts that the basis will respond over time to client flow in the dollar IRS market with the basis increasing (decreasing) whenever clients sell (buy) dollar swap contracts on LCH. In this section we test this hypothesis using a Vector Auto-Regression (VARX) model. Our model takes the form:

\[ y_t = a + \sum_{i}^{3} (C_i y_{t-i} + d_i X_{t-i}) + u_t, \quad u \sim (0, \Sigma) \]  

where \( t \) denotes weeks, \( y_t \) is the vector of endogenous variables and \( X_{t-1} \) is a vector of exogenous variables. The endogenous variables are:

\[
y_t = \begin{bmatrix}
  Flex\_Ratio_t \\
  IRS\_Net\_Vlm \\
  IM_t \\
  Basis_t
\end{bmatrix}
\]

where \( IRS\_Net\_Vlm \) is the client net (i.e. buy minus sell) volume of dollar-denominated IRS contracts, cleared in LCH, and the \( Libor\_Spread \) is treated as exogenous. The rest of the variables are the same as the ones used in our time series regressions. The number of lags in the model is determined by the Schwarz Information Criterion (SIC).

To identify our model we apply short-term restrictions (via a Cholesky decomposition) treating \( Flex\_Ratio \) as the most exogenous variable and the basis as the most endogenous one. This ordering is inspired from our model where structural flow imbalances in each CCP increase dealers’ IM, which then gives rise to a CCP basis in the dollar swap market.
However, the results of the VAR model are not sensitive to the particular ordering that we choose.

Figure 2 shows impulse response functions calculated from the estimated coefficients of model (11). Charts (a), (b) and (c) show the impulse responses of the CME-LCH basis to shocks in dealers’ posted margin ($IM$), the fraction of client volume traded with non-dealer banks ($Flex\_Ratio$) and our estimate of dealers’ funding costs ($Libor\_Spread$). These responses corroborate the findings of the time-series regressions; they show that both $IM$ and $Libor\_Spread$ have positive and longer-lasting impacts on the CCP basis whereas $Flex\_Ratio$ has a negative and more short-lived one. Chart (d) shows the response of the basis to a shock in client net volume in dollar swaps cleared via LCH and provides a test for Hypothesis 4 described above. The chart shows that when client net volume is positive, the CME-LCH basis decreases. In other words, when clients trade in a direction that reduces dealers’ imbalance, the CME-LCH basis shrinks and vice versa. This is consistent with the dynamics of our model where dealers use the basis to recoup their collateral costs.

6 Conclusion

With central clearing becoming a key feature of OTC derivatives markets after the financial crisis, questions regarding the scope and size of CCPs are becoming increasingly important due to the economic significance of choosing one option versus another. Our paper sheds light on an important aspect of these options, namely what happens when clearing in comparable products is fragmented. In this respect, we document an economically significant price differential between the same dollar swap contracts cleared in CME and LCH (the CME-LCH basis) and argue that this is a result of dealers seeking compensation for bearing increased collateral costs when clearing is fragmented. To formalize our argument, we use a basic dealer inventory funding cost framework and, using LCH data on prices, transactions and collateral, we provide empirical evidence consistent with this explanation.
**Figure 2**: Impulse response functions obtained from estimating model (11). The CME-LCH basis defined in equation (9). \( IM \) is the total initial margin posted by swap dealers on LCH, \( Flex\_Ratio \) is the fraction of volume across all SwapClear products that dealers transact with non-dealer banks, \( Libor\_Spread \) is the difference between the three-month USD Libor rate and the overnight federal funds rate and \( IRS\_Net\_Vlm \) is the client net (i.e. buy minus sell) volume in USD interest rate swap contracts cleared in LCH. The dotted lines show the 95% confidence intervals of the estimated impulse responses.

(a) Impact of \( IM \) on Basis

(b) Impact of \( Flex\_Ratio \) on Basis

(c) Impact of \( Libor\_Spread \) on Basis

(d) Impact of \( IRS\_Net\_Vlm \) on Basis
References


Fleming, M., Rosenberg, J., 2008. How do treasury dealers manage their positions?


Randall, O., 2015. How do inventory costs affect dealer behavior in the US corporate bond market?


Appendix

Lemma 1. Expected order flow from liquidity traders in the two CCPs

The expected order flow by liquidity traders, in each CCP, depends on the relationship between mid-quotes ($m^A_t$) and the intrinsic value ($\mu_t$) and is given by the expressions in the following table:

<table>
<thead>
<tr>
<th></th>
<th>CCP A: $E_t[d^A_t]$</th>
<th>CCP B: $E_t[d^B_t]$</th>
</tr>
</thead>
<tbody>
<tr>
<td>$\mu_t \leq m^A_t &lt; m^B_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1)$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi) - \delta$</td>
</tr>
<tr>
<td>$m^A_t &lt; \mu_t &lt; m^B_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1) + \frac{1}{2}\delta$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi) - \frac{1}{2}\delta$</td>
</tr>
<tr>
<td>$m^A_t &lt; m^B_t \leq \mu_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1) + \delta$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi)$</td>
</tr>
<tr>
<td>$\mu_t &lt; m^A_t = m^B_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1) - \frac{1}{2}\delta$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi) - \frac{1}{2}\delta$</td>
</tr>
<tr>
<td>$m^A_t = m^B_t = \mu_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1)$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi)$</td>
</tr>
<tr>
<td>$m^A_t = m^B_t &lt; \mu_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1) + \frac{1}{2}\delta$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi) + \frac{1}{2}\delta$</td>
</tr>
<tr>
<td>$\mu_t \leq m^B_t &lt; m^A_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1) - \delta$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi)$</td>
</tr>
<tr>
<td>$m^B_t &lt; \mu_t &lt; m^A_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1) - \frac{1}{2}\delta$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi) + \frac{1}{2}\delta$</td>
</tr>
<tr>
<td>$m^B_t &lt; m^A_t \leq \mu_t$</td>
<td>$\frac{1}{2}(1-\delta)(2\pi - 1)$</td>
<td>$\frac{1}{2}(1-\delta)(1-2\pi) + \delta$</td>
</tr>
</tbody>
</table>

Proof of Lemma 1:

Total liquidity trader flow is the sum of the flows of the price-insensitive and price-sensitive traders. Price-insensitive flow imbalance in CCP A is $\frac{1}{2}(1-\delta)(2\pi - 1)$ and in CCP B is $\frac{1}{2}(1-\delta)(1-2\pi)$. Price-sensitive order flow depends on the relationship between the mid-quotes and the intrinsic value. There are three cases: (i) $m^A_t < m^B_t$, (ii) $m^A_t = m^B_t$, and (iii) $m^A_t > m^B_t$. When $m^A_t < m^B_t$, $\mu_t$ could be smaller than $m^A_t$, larger than $m^A_t$ but less than $m^B_t$, or larger than $m^B_t$. In the first case, price sensitive traders will only sell in CCP B. Hence, their flow is zero in CCP A and $-\delta$ in CCP B. In the second case, price sensitive traders in CCP A will buy and those in CCP B will sell. Hence, their flow will
equal $\frac{1}{2}\delta$ in CCP $A$ and $-\frac{1}{2}\delta$ in CCP $B$. In the last case, price sensitive traders will only buy in CCP $A$. Hence, their flow will be $\delta$ in CCP $A$ and zero in CCP $B$.

When $m_t^A = m_t^B$, price sensitive traders will use their local CCPs. If $\mu_t$ is smaller than the mid-quotes, they will sell. Hence, their flow will be $-\frac{1}{2}\delta$ in both CCPs. If $\mu_t$ is equal to the mid-quotes, they will not trade and the flows will be zero in both CCPs. Finally, if $\mu_t$ is bigger than the mid-quotes, price sensitive traders will buy. Hence, their flows will be $\frac{1}{2}\delta$ in both CCPs. Exactly symmetric arguments apply when $m_t^A > m_t^B$.

**Proof of Proposition 1:**

To derive the rational expectations equilibrium, we conjecture a linear relationship between quoted prices and dealer inventories. In particular, we conjecture that quoted prices should reflect a mark-down (or mark-up) on the fundamental asset price, because of dealer collateral costs. As such, quoted prices in each CCP are functions of inventories in both CCPs:

\[
\begin{pmatrix}
    p_t^A \\
    p_t^B
\end{pmatrix} =
\begin{pmatrix}
    \mu_t \\
    \mu_t
\end{pmatrix} -
\begin{bmatrix}
    \beta_1 & \beta_2 \\
    \beta_3 & \beta_4
\end{bmatrix}
\begin{pmatrix}
    z_{t+1}^A \\
    z_{t+1}^B
\end{pmatrix}
\]

In matrix form, this can be written as:

\[
p_t = \mu_t - \beta z_{t+1} = \mu_t - \beta(z_t - q_t)
\]

Taking expectations, this gives us:

\[
E_t[p_{t+1}] = E_t[\mu_{t+1}] - \beta E_t[z_{t+1}] + \beta E_t[q_{t+1}]
= \mu_t - \beta z_{t+1} + \beta E_t[q_{t+1}]
= p_t + \beta E_t[q_{t+1}]
\]

Now let $\Delta \equiv \frac{1}{2}(1 - \delta)(2\pi - 1)$. From Lemma 1, we have the following order flow patterns
for each inventory configuration:

<table>
<thead>
<tr>
<th></th>
<th>$E_t[d_t^A]$</th>
<th>$E_t[d_t^B]$</th>
<th>$z_{t+1}^A$</th>
<th>$z_{t+1}^B$</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. $\mu_t \leq m_t^A &lt; m_t^B$</td>
<td>$\Delta$</td>
<td>$-\Delta - \delta$</td>
<td>$\leq 0$</td>
<td>$&lt; 0$</td>
</tr>
<tr>
<td>2. $m_t^A &lt; \mu_t &lt; m_t^B$</td>
<td>$\Delta + \frac{1}{2}\delta$</td>
<td>$-\Delta - \frac{1}{2}\delta$</td>
<td>$&gt; 0$</td>
<td>$&lt; 0$</td>
</tr>
<tr>
<td>3. $m_t^A &lt; m_t^B \leq \mu_t$</td>
<td>$\Delta + \delta$</td>
<td>$-\Delta$</td>
<td>$&gt; 0$</td>
<td>$\geq 0$</td>
</tr>
<tr>
<td>4. $\mu_t &lt; m_t^A = m_t^B$</td>
<td>$\Delta - \frac{1}{2}\delta$</td>
<td>$-\Delta - \frac{1}{2}\delta$</td>
<td>$&lt; 0$</td>
<td>$&lt; 0$</td>
</tr>
<tr>
<td>5. $m_t^A = m_t^B = \mu_t$</td>
<td>$\Delta$</td>
<td>$-\Delta$</td>
<td>$= 0$</td>
<td>$= 0$</td>
</tr>
<tr>
<td>6. $m_t^A = m_t^B &lt; \mu_t$</td>
<td>$\Delta + \frac{1}{2}\delta$</td>
<td>$-\Delta + \frac{1}{2}\delta$</td>
<td>$&gt; 0$</td>
<td>$&gt; 0$</td>
</tr>
<tr>
<td>7. $\mu_t \leq m_t^B &lt; m_t^A$</td>
<td>$\Delta - \delta$</td>
<td>$-\Delta$</td>
<td>$&lt; 0$</td>
<td>$\leq 0$</td>
</tr>
<tr>
<td>8. $m_t^B &lt; \mu_t &lt; m_t^A$</td>
<td>$\Delta - \frac{1}{2}\delta$</td>
<td>$-\Delta + \frac{1}{2}\delta$</td>
<td>$&lt; 0$</td>
<td>$&gt; 0$</td>
</tr>
<tr>
<td>9. $m_t^B &lt; m_t^A \leq \mu_t$</td>
<td>$\Delta$</td>
<td>$-\Delta + \delta$</td>
<td>$\geq 0$</td>
<td>$&gt; 0$</td>
</tr>
</tbody>
</table>

There are now several different cases:

(I) when $z_{t+1}^A z_{t+1}^B > 0$, the first order conditions of the dealer’s problem in equations (3) and (4) imply:

$$
\begin{bmatrix}
E_t[p_{t+1}^A] - p_t^A \\
E_t[p_{t+1}^B] - p_t^B
\end{bmatrix}
= \begin{cases}
-\phi \sigma, & \text{if } z_{t+1}^A < 0, z_{t+1}^B < 0 \\
-\phi \sigma, & \text{if } z_{t+1}^A > 0, z_{t+1}^B > 0
\end{cases}
$$

This case corresponds to rows 4 and 6 in the above table. So, from the order flow values in these rows, from equations (A2) and (A3) and the market clearing condition $d_t^i = q_t^i$, we have that:

$$
\beta = \frac{\phi \sigma}{\delta} \begin{bmatrix} 1 & 1 \\ 1 & 1 \end{bmatrix}
$$

(II) Similarly, when $z_{t+1}^A z_{t+1}^B < 0$ equations (3) and (4) imply:
Again, using the values of the client order flows for this case (rows 2 and 8 in the above table) along with equations (A3) and (A2) and the market clearing condition, we obtain:

$$\beta = -\frac{\phi\sigma}{\delta - |2\Delta|} \begin{bmatrix} 1 & -1 \\ -1 & 1 \end{bmatrix}$$

(III) Finally, when $z_{t+1}^A z_{t+1}^B = 0$ equations (3) and (4) imply:

$$\begin{bmatrix} -\phi\sigma \\ 0 \\ 0 \end{bmatrix}, \text{ if } z_{t+1}^A < 0, z_{t+1}^B = 0$$

$$\begin{bmatrix} \phi\sigma \\ 0 \\ 0 \end{bmatrix}, \text{ if } z_{t+1}^A = 0, z_{t+1}^B < 0$$

$$\begin{bmatrix} 0 \\ 0 \\ 0 \end{bmatrix}, \text{ if } z_{t+1}^A = 0, z_{t+1}^B = 0$$

$$\begin{bmatrix} 0 \\ 0 \\ 0 \end{bmatrix}, \text{ if } z_{t+1}^A = 0, z_{t+1}^B = 0$$

$$\begin{bmatrix} 0 \\ 0 \\ 0 \end{bmatrix}, \text{ if } z_{t+1}^A = 0, z_{t+1}^B = 0$$

(A5)
Doing similar calculations as in the other cases, we have:

\[
\beta = -\frac{\phi \sigma}{\delta} \begin{bmatrix} 1 & 0 \\ 0 & 1 \end{bmatrix}
\]

Inserting the values of the estimated parameter vectors \( \beta \) in equation (A1) yields the expressions in (5) for quoted prices. The expressions for the mid-quotes are easily obtained by taking the average of the quoted bid and ask prices. These, in turn, are derived by setting \( q_t = -1, +1 \) respectively in equation (A1). Thus, for CCP \( i \), the quoted bid and ask prices are:

**Bid:** \( p^b_t = \mu_t - \beta z_t - \beta \)

**Ask:** \( p^a_t = \mu_t - \beta z_t + \beta \)

Taking the average of these two gives the mid-quote:

\[
m_t = \mu_t - \beta z_t
\]

Inserting the values of \( \beta \) in this expression, yields equation (6).