

Central Counterparty Exposure in Stressed Markets*

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Abstract

Time is valuable, particularly in stressed markets. As central counterparties (CCPs) have become systemically important, we need to understand the dynamics of their exposure towards clearing members at high frequencies. We track such exposure and decompose it which leads to the following insights. The composition of CCP exposure is fundamentally different in the tails. At extreme levels or during rapid increases, there is elevated crowding. This is the result of clearing members all concentrating their positions on a single security or a particular portfolio, desirable if motivated by hedging, worrying if due to speculation.

1 Introduction

Regulators are worried about central counterparties (CCPs) risk management in fast markets. Sudden extreme price dislocations (“Flash Crashes”)¹ coupled with super-human trading speeds could have systemic consequences. If traders are unable to deliver on their trades, then CCPs become liable for their losses because a CCP effectively insures the counterparties in these trades. The margins posted by these defaulting traders might not be sufficient to cover these losses. A recent example is the 2018 failure of a Nasdaq clearing member where losses swallowed up two-thirds of the default fund.² Such mutualized loss might itself trigger further defaults in which case the event becomes potentially systemic.

State-of-the-art risk management at CCPs therefore becomes of first order importance. [CPMI-IOSCO \(2017\)](#) emphasizes the need for monitoring intraday CCP exposure (p. 32):

Adverse price movements, as well as participants building larger positions through new trading (and settlement of maturing trades), can rapidly increase a CCP’s exposures to its participants. This exposure can relate to intraday changes in both prices and positions. For the purposes of addressing these and other forms of risk that may arise intraday, a CCP should address and monitor on an ongoing basis. . .

In this paper we propose a way for CCPs to monitor their exposure intradaily with a focus on stressed markets. In such markets, trading is likely to be fast-paced and data therefore streams at extreme speeds. The approach should be able to cope with such “big data” challenges. More importantly, the monitoring should yield valuable economic insights that generate an understanding of “what just happened,” and potentially guide interventions.

¹On February 5, 2018, VIX futures jumped 20 points, which is the largest daily increase since the 1987 stock market crash. On October 7, 2016, the British pound dropped by almost ten percent in just eight minutes. On January 15, 2015, the Swiss franc rose by about 20% against the euro within five minutes after the Swiss National Bank announced that it abandoned its peg against the euro as per immediately.

²On September 10, 2018, the Nordic-German power spread increased by more than 17 times the average daily change which triggered the trader’s default.

We turn to the academic literature to formulate hypotheses to guide our high-frequency analysis of CCP exposure. Several studies have identified a fire-sale channel as the root cause of price dislocations. The narrative is as follows. During normal times, arbitrageurs smooth prices by trading against pricing errors (thereby essentially engaging in market making). Suppose that at some point a critical mass of them crowds on a single risk factor. That is, their portfolio positions are very similar, say long a book-to-market or size-based portfolio.³ If these positions suddenly experience a significant loss then arbitrageurs face high variation margin calls (to mark-to-market their positions). If these arbitrageurs are capital constrained then they might be forced to free up capital by selling some of their positions. This selling pressure might trigger trades at fire-sale prices, thus leading to more losses, triggering further selling, etc. (Shleifer and Vishny 1997, Gromb and Vayanos 2002, Brunnermeier and Pedersen 2009). Perhaps the most prominent example of such dynamic is the “Quant Meltdown” where the arbitrageurs were hedge funds and the portfolios were indeed factor-based portfolios (Khandani and Lo 2007, 2011). Such fire-sale channel implies that extreme exposures coincide with elevated crowding, price crashes, and volatility spikes.

With these motivations let us now discuss in more detail what we do in the remainder of the paper. We develop an approach for tracking and decomposing CCP exposure intradaily. The exposure measure is based on the tail risk of losses in an oncoming period, aggregated across all clearing members (Duffie and Zhu 2011, Menkveld 2017).⁴ The measure relies on analytic results that are all straightforward to compute. It further allows for decomposition across clearing members or securities.

We implement the approach on a sample of high-frequency CCP data to test three hypotheses on CCP exposure in stressed markets. We define such markets for a CCP as ones where either its exposures are at the highest *levels* or its exposure *changes* are extremely high.⁵ The three hypotheses pertain to the following

³Wagner (2011) clarifies that these arbitrageurs could hold diversified portfolios, yet be exposed to the fire-sale channel. It is position *diversity* that is the driving force here, not the level of diversification.

⁴Menkveld (2017) extends Duffie and Zhu (2011) to focus on the tail risk in losses as opposed to mean losses.

⁵One could argue that the tails are not riskier to a CCP because higher exposures against clearing members are insured by the latter posting higher margins with the CCP. While this is true, it is also true that if there are losses that exceed the margin, they exceed by a larger amount in the tail (i.e., loss given default is likely to be larger). A deeper analysis of risk *net* of margin and other forms of collateralization (e.g., the default fund) are beyond the scope of this study as intraday margin and default-fund data are

questions:

1. Are extreme increases in CCP exposure driven by the same factors as regular exposure changes? Or does one see, for example, elevated crowding?
2. Is the same true for extreme *levels* as opposed to extreme *changes*? Again, is crowding a larger part of it?
3. Finally, when comparing CCP exposure for these extreme levels relative to normal levels, is the relative contribution of clearing-member house accounts higher relative to client accounts? If so, then this is worrisome as clearing members are typically highly leveraged financial intermediaries and therefore less able to absorb large shocks.

The empirical analysis that we do to address these questions is based on a high-frequency 2009-2010 sample of a European CCP: European Multilateral Clearing Facility (EMCF). This CCP was the largest equity CCP in Europe and later merged with DTCC in the US to become the world's largest equity CCP. Counterparty risk arises in equity trading because the settlement of a trade typically occurs three days after it is concluded. A trade therefore is like a three-day forward contract between a buyer and a seller. Counterparty risk then pertains to one side defaulting in this period. Admittedly, analysis of a CCP that insures credit default swaps or interest rate swaps would have been more relevant in terms of systemic risk, but disaggregated CCP data is extremely hard to come by (see literature review below). The application to actual CCP data could therefore in and of itself be considered a contribution.⁶

There are several key findings. First, CCP exposure changes, on average, are almost entirely driven by changes in the positions of clearing members due to their trading. However, when zooming in on extreme exposure increases, security volatility and position crowding start to contribute substantially. For the top

unavailable to us.

⁶We do not know how our findings compare to CCP exposures in the market for credit default swaps or for interest rate swaps for lack of evidence. We, however, believe that our approach could be implemented for trading in these markets in spite of their different market structure (which features mostly over-the-counter trading as opposed to trading via a central limit order book).

100 increases they collectively contribute 30% where volatility contributes 13% and crowding 17%.

Second, we find a similar result when comparing the full sample with the subsample of high exposure *levels* — more crowding in the latter. More specifically, CCP exposure concentrates on a few clearing members and a smaller set of risk factors. For example, comparing the full sample with the top 1% subsample, the contribution of the largest five members increases from 28% to 47%. The contribution of the largest principal component across all risk factors increases from 7% to 42%.

Third, it is not true that at high exposure levels the CCP is relatively more exposed to house accounts. There is only a modest increase from 67% to 70% when comparing the full sample to the top 1%. However, we do find stronger concentration *within* the set of house accounts. A large share of the total house-account exposure originates from just a few clearing members.

In sum, the findings collectively suggest that stronger crowding/concentration characterizes CCP exposure both for large exposure increases and at extremely high exposure levels. There is, however, only a minor increase in the contribution of house accounts at these high levels.

One additional finding worth emphasizing is that idiosyncratic events can severely impact CCP exposure. For example, a disappointing earnings announcement by Nokia at noon on April 22, 2010 caused its share price to fall by about 15% in the minutes after, leading to an exposure increase of almost 16 times its average size. The decomposition of the exposure change shows that volatility is the largest component causing the jump. The exposure jump, however, was only a relatively small part of the extremely large CCP exposure increase that day. Most of it appears to be caused by clearing members increasing their Nokia position, either long or short, during heavy trading in the afternoon. (Note that this is a non-trivial finding as the strong volume could have been due to traders reducing their positions after observing elevated volatility.⁷) The decomposition of exposure changes further reveals a substantial contribution of the crowding component that day. Members tilted their portfolio towards Nokia. Altogether the Nokia example neatly illustrates the

⁷Bignon and Vuillemeay (2019, Fig. 3 and A1) do a forensic analysis on the Paris commodity futures CCP that failed in 1974. They, for example, find that there was elevated activity (in terms of transactions) in the half year before failure, but open positions declined (measured in 1000 tons sugar).

paper’s main finding that volatility and crowding become important components of CCP exposure in the tails.

Our paper contributes to a rapidly expanding empirical literature on central clearing. CCP trade data disaggregated across members are scarce. Proprietary daily data have been used to compare CCP exposure to the margins collected (Jones and Perignon 2013, Menkveld 2017, Lopez et al. 2017). Duffie et al. (2015) analyze a snapshot of bilateral exposures on uncleared credit default swaps to assess the netting efficiency potential of central clearing. Event studies on CCP introductions yield insight in how trading is affected (Loon and Zhong 2014, 2016, Menkveld et al. 2015, Benos et al. 2016). We contribute to this literature by proposing an approach to monitor CCP exposure intradaily along with an economically motivated decomposition. The methodological contribution relative to Menkveld (2017) is that we decompose his exposure measure to diagnose the nature of exposure changes. Although Menkveld (2017) discusses how to decompose across clearing members, he does not decompose exposure *changes* into changes in the various variables that enter the exposure computation (e.g., changes in volatility, changes in return correlations, or changes in positions). Such decomposition is needed to test the first hypothesis.⁸

The paper contributes to a nascent literature on CCP systemic risk. Capponi et al. (2015) analyze the endogenous build-up of asset concentration due to central clearing. Amini et al. (2015) investigate partial netting for a subset of liabilities in a network setting that accounts for knock-on effects and asset liquidation effects. Glasserman et al. (2015) compare margining in dealer markets and a centrally cleared market. Menkveld (2016) endogenizes the fire-sale premium that a CCP will have to pay in the catastrophic state that a critical mass of members default and liquidity supply is thus impaired.⁹

The rest of the paper is organized as follows. Section 2 formalizes and motivates the three overriding hypotheses. Section 3 presents the approach to monitoring and decomposing CCP exposure. Section 4

⁸More precisely, Menkveld (2017) shows that there is a positive time-series correlation between crowding and CCP exposure at a daily level. This paper, however, studies exposures *intradaily* and *decomposes* changes into all variables that enter the calculation of *ExpCCP*.

⁹A related set of papers does not focus on concentration and systemic risk but rather on incentives and economic efficiency includes Koeppl et al. (2012), Fontaine et al. (2014), Acharya and Bisin (2014), Biais et al. (2016), Huang (2019).

describes the data and discusses implementation issues. Section 5 presents the empirical results of testing the three hypotheses. Section 6 concludes.

2 Hypotheses

This section develops three hypotheses that will be taken to the data. Each hypothesis is stated formally and then followed by a motivation.

Hypothesis 1. *The drivers of CCP exposure changes are different in the (right) tail.*

CCP exposure changes can be driven by a variety of factors that are either price-related (e.g., volatility or correlation) or trade-related (i.e., trade causes member positions to change). We expect the latter to dominate CCP exposure changes in normal times. However, we conjecture that turbulent periods are characterized by elevated volatility and lots of trading. The strong positive correlation of volatility and trading volume is a well-known stylized fact in the microstructure literature (e.g., [Jones et al. 1994](#)).

The intense trading at times of extremely high volatility does *not* necessarily imply that CCP exposure increases rapidly. A sudden volatility increase might actually trigger traders to *reduce* their existing positions to contain risk. Such trading benefits a CCP as it reduces its exposure.

On the other hand, a volatility shock might lead to (more) speculation in which case traders increase their positions. A heterogeneity in beliefs or in signals might generate such stronger position taking (e.g., [Kim and Verrecchia 1994](#)). Or, in a more recent paper, [Crego \(2019\)](#) proposes a channel by which risk-averse informed traders strategically wait to trade on their (idiosyncratic) signal until the arrival of a public signal which removes significant uncertainty. Either way, member positions would increase in magnitude and CCP exposure rises as a result.

An even more worrisome channel that could cause high volatility and fast trading is a so-called self-reinforcing fire-sale channel. For example, financially constrained arbitrageurs (hedge funds, sell-side

banks, high-frequency traders, etc.) hit by adverse price shocks might have to quickly liquidate their large positions and thereby cause transitory price shocks (Shleifer and Vishny 1997, Gromb and Vayanos 2002, Brunnermeier and Pedersen 2009).

Such liquidations would not be a concern if these arbitrageurs had diverse positions (Wagner 2011). This is not the case, however, if these traders followed similar trading strategies and their portfolios thus crowd on a small set of risk factors/portfolios (Stein 2009). In such scenario, there might not be enough cash-in-the-market to liquidate these positions and markets have to clear at fire-sale prices. A prominent example is the “Quant Meltdown” of 2007 when quantitative equity market-neutral hedge funds crowded on similar trading strategies and made record losses (Khandani and Lo 2007, 2011). The risk that a CCP finds itself in such scenario is particularly high when there is substantial crowding in its members’ portfolios.

To test for such crowding in stressed markets, one needs to be able to decompose changes in CCP exposure into price- and trade-related components. One of the trade-related components should then be crowding across clearing members.

Hypothesis 2. *The structure of CCP exposure levels is different in the (right) tail.*

Hypothesis 2 restates Hypothesis 1 but this time in terms of *levels* instead of *changes*. The reason to also study whether there is, for example, elevated crowding for extreme exposure levels is derived from studies on historical CCP failures. Bignon and Vuillemeys (2019) study the 1974 failure of the Paris Commodity Clearing House. They show that in a year starting from November 1973 the position of the largest clearing member rose from 9% of the total open position in sugar futures to 56% of it. Another example is the 1987 failure of the Hong Kong Futures Guarantee Corporation where at the point of failure the largest four members had accumulated 80% of the short position in all contracts (Cox 2015).

If crowding is prominent, understanding what causes the crowding requires one to be able to decompose the exposure level across clearing members and across risk factors. The reason is that strong crowding could occur when outstanding positions are held by only a few clearing members. The CCP failures in Paris and

Hong Kong are examples of such crowding. There is, however, a more opaque way for there to be elevated crowding. In the extreme case, all clearing members contribute equally to CCP exposure but they crowd on a single risk factor, for example a particular security or portfolio. The 2007 Quant Crisis is an example of such “risk-factor crowding.” Let us turn to a simple example to make this distinction between the two types of crowding as clear as possible.

Suppose there are four clearing members and two assets with independently distributed payoffs. First consider the baseline case of member 1 and member 2 having traded one unit of asset A and therefore having open and opposite positions in this asset. Suppose the same holds for member 3 and 4 in asset B. In this baseline case there is no crowding. Let us now consider the two polar cases of crowding. An example of perfect *member* crowding is when member 1 and 2 trade as in the baseline case, and member 3 and 4 refrain from trading. The reason is that there is concentration in CCP exposure as only two members contribute. For an example of perfect *risk-factor* crowding, consider again the baseline case but now with member 3 and 4 also trading one unit of asset A. Note that in this case all clearing members contribute equally to CCP exposure, yet there is perfect crowding. In both cases there is a strong correlation in portfolio returns across clearing members which increases the expected aggregate loss and therefore CCP exposure (Menkveld 2017, Section 1.5).

When testing the second hypothesis it is desirable to measure how much crowding contributes to CCP exposure and whether such crowding is member or risk-factor crowding. We discuss in detail in Section 3.3 how to measure crowding with the proposed CCP exposure measure.

Hypothesis 3. *The relative contribution of house accounts to CCP exposure increases in the (right) tail.*

The third hypothesis focuses on the two types of clearing-member accounts: house accounts and client accounts. House accounts capture the trades that clearing members do for their own books whereas client accounts register their cleared trades on behalf of clients. It is worth decomposing CCP exposure across these two types of accounts as one could argue that CCP exposure to house accounts carries more risk.

Clearing members are often highly leveraged financial intermediaries whose trading is unlikely to be pure hedging. For example, they often engage in market making to absorb temporary order imbalances. Therefore more exposure to house accounts at times of high CCP exposure is worrisome. Testing the third hypothesis will show whether or not this is the case.

3 Approach

This section presents an approach to monitoring CCP exposure intradaily. It is based on the framework proposed by [Duffie and Zhu \(2011\)](#) and extended by [Menkveld \(2017\)](#) to include tail risk and crowding. CCP exposure is essentially a measure that is based on the distribution of losses in clearing member accounts for the oncoming period. We study the Value at Risk (VaR) for these losses following [Menkveld \(2017\)](#).¹⁰ We first present the exposure measure in detail, then show how one could decompose exposure *change* needed for testing the first hypothesis, and finally present the decomposition of exposure *level* which is needed for testing the second and third hypotheses.

3.1 The CCP exposure measure: A VaR of aggregate loss

Consider the case of a single CCP, I securities, and J clearing members (or traders, the two terms will be used interchangeably). P_t is an $I \times 1$ vector consisting of current security prices. R_t is an $I \times 1$ vector that contains next period's security returns. R_t is assumed to be normally distributed:¹¹ $R_t \sim \mathbf{N}(0, \Omega_t)$ where Ω_t is the $I \times I$ covariance matrix of security returns. Let $n_{j,t}$ be the $I \times 1$ vector of member j 's current positions expressed in euro. The portfolio return in euro for the member in the next period is then a scalar $X_{j,t}$ where $X_{j,t} = n'_{j,t} R_t$.

Collect all $n_{j,t}$ into an $I \times J$ matrix N_t which thus becomes the (euro) position matrix of all members.

¹⁰[Duffie and Zhu \(2011\)](#) study the *mean* loss which is invariant to the level of crowding — the VaR loss is not.

¹¹The normality assumption yields analytic results for CCP exposure along with a natural decomposition. To stay close to normality in the data, the sample clock will run in volume time (for details see Section 4.2.)

Collect all $X_{j,t}$ into the $J \times 1$ vector X_t which thus becomes the future return vector for all members, where $X_t = N_t' R_t$. Since X_t is linear in R_t , X_t is normally distributed: $X_t \sim \mathbf{N}(0, \Sigma_t)$ where $\Sigma_t = N_t' \Omega_t N_t$ is the $J \times J$ covariance matrix of (euro) portfolio returns.

As a CCP is exposed to losses, define

$$L_{j,t} = -\min(0, X_{j,t}) \quad (1)$$

as the loss in member j 's portfolio. Then aggregate loss A_t is:

$$A_t = \sum_j L_{j,t}. \quad (2)$$

[Duffie and Zhu \(2011\)](#) propose to base CCP exposure on the *mean* aggregate loss:

$$E(A_t) \quad (3)$$

and derive an analytical expression for it which suffices for their analysis of netting efficiency. [Menkveld \(2017\)](#) considers the VaR of aggregate loss a more appropriate measure for CCP exposure and refers to it as *ExpCCP*. Following standard practice and maintaining tractability, [Menkveld \(2017\)](#) uses the delta-normal method to compute the VaR:

$$ExpCCP_t \equiv \text{VaR}(A_t) = E(A_t) + \alpha \text{var}(A_t)^{\frac{1}{2}}, \quad (4)$$

where α is a parameter that needs to be calibrated. We follow [Menkveld \(2017\)](#) and use *ExpCCP* as our exposure measure. In [Appendix A](#) we list all the results needed to compute *ExpCCP*.

3.2 Decomposition of CCP exposure change

The first hypothesis states that the drivers of CCP exposure change are different in the tail. As discussed in the hypothesis section, sudden extreme CCP exposure increases might be driven by volatility shocks and crowding in addition to position changes. To test such hypothesis one needs to decompose exposure changes and verify to what extent volatility and crowding contribute a larger part in the tail.

We propose to decompose exposure changes based on a relatively straightforward one-factor-at-a-time (OFAT) approach (Daniel 1973). The underlying factors will consist of price-related factors and trade-related factors. Price-related factors include security return volatility, correlation, and price level. Trade-related factors are member positions and crowding across members. The remainder of this subsection describes the approach in detail.

Let us start by writing $ExpCCP_t$ as defined in (4) as a function of the underlying variables:

$$ExpCCP_t = f(\Sigma_t). \quad (5)$$

To arrive at a meaningful decomposition across factors we use the following two insights:

1. Following the financial econometrics literature we decompose covariance matrices into their diagonal and off-diagonal components (Bollerslev 1990, Engle 2002):

$$\Psi_t = D_{\Psi_t} R_{\Psi_t} D_{\Psi_t}, \quad (6)$$

where D_{Ψ_t} is a diagonal matrix with $\psi_{ii,t}$ as the i -th diagonal element and R_{Ψ_t} is the correlation matrix associated with the covariance matrix Ψ_t . This decomposition will turn out to be useful to identify correlation effects in security returns and crowding across members.

2. Σ_t is itself a function of “deeper” variables:

$$ExpCCP_t = f(\Sigma_t) = f(N_t \Omega_t N_t') = f(\Omega_t, P_t, \tilde{N}_t), \quad (7)$$

where the variables are: the covariance matrix of security returns Ω_t , the price level P_t , and the member portfolio matrix \tilde{N}_t expressed in terms of the number of securities (as opposed to N_t which is expressed in euro). The reason for using \tilde{N}_t instead of N_t is to be able to pull out a price-level effect when considering the change from N_{t-1} to N_t .

Combining (6) and (7) yields:

$$ExpCCP_t = f(\Sigma_t) = f(D_{\Sigma_t} R_{\Sigma_t} D_{\Sigma_t}') = f\left(D_{\Sigma_t} \left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_t\right), R_{\Sigma_t} \left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_t\right)\right), \quad (8)$$

which expresses $ExpCCP_t$ in terms of price-related variables ($D_{\Omega_t}, R_{\Omega_t}, P_t$) and trade-related variables (\tilde{N}_t). The OFAT decomposition changes these variables sequentially from their value at $t - 1$ to their value at t . The sequencing matters (as will be discussed in-depth at the end of this subsection) and we pick the baseline sequencing motivated by the following principles:

- We first change price variables and then change trade variables. The reason for this sequencing is that it identifies a pure price effect. In other words, the price components communicate what CCP exposure change would have been had members' portfolios not changed.
- Changes in idiosyncratic volatility precede changes in correlations. In other words, we first consider changes in the diagonal and then changes in the off-diagonal of a covariance matrix. This approach makes interpretation of the components straightforward: Changes in variances become pure in the sense that they are evaluated keeping correlations constant.

These principles therefore suggest the following baseline OFAT decomposition:

$$\begin{aligned} \Delta ExpCCP_t = & f\left(D_\Sigma\left(\overset{1}{D_{\Omega_t}}, \overset{2}{R_{\Omega_t}}, \overset{3}{P_t}, \overset{4}{\tilde{N}_t}\right), R_\Sigma\left(\overset{1}{D_{\Omega_t}}, \overset{2}{R_{\Omega_t}}, \overset{3}{P_t}, \overset{5}{\tilde{N}_t}\right)\right) \\ & - f\left(D_\Sigma\left(D_{\Omega_{t-1}}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right), R_\Sigma\left(D_{\Omega_{t-1}}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right)\right), \end{aligned} \quad (9)$$

where the sequencing is illustrated by the (red) numbers on top of the various variables. The decomposition yields five components. For example, the first component *RetVola_t* is computed as:¹²

$$\begin{aligned} RetVola_t = & f\left(D_\Sigma\left(\mathbf{D}_{\Omega_t}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right), R_\Sigma\left(\mathbf{D}_{\Omega_t}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right)\right) \\ & - f\left(D_\Sigma\left(D_{\Omega_{t-1}}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right), R_\Sigma\left(D_{\Omega_{t-1}}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right)\right), \end{aligned} \quad (10)$$

which captures the contribution of volatility change.

We list the five components below and discuss each of them in detail. Note that the numbering corresponds to the red numbers in (9):

Price components.

1. *RetVola*: The impact of a change in return volatility on CCP exposure change. This effect captures the well-known empirical fact that volatility is time-varying (commonly referred to as GARCH or stochastic volatility in the financial econometrics literature).
2. *RetCorr*: The additional impact of a change in the correlations of security returns on CCP exposure change. The time-varying nature of such correlations is another well-known empirical fact and can be identified, for instance, through a dynamic conditional correlation (DCC) model (Engle 2002).
3. *PrLevel*: The additional impact of a change in the price level of securities. This effect is entirely due to covariance matrices being defined in relative terms (i.e., they are based on relative returns as opposed to euro returns). For example, a covariance matrix might not have changed in the interval,

¹²We include explicit formulas for all five components in Appendix B for completeness.

but if price levels dropped, then CCP exposure dropped because the latter is defined in terms of the euro. Such effect is picked up by *PrLevel*.

Trade components.

4. *TrPosition*: The additional impact of trades. These trades might expand or reduce members' existing positions. CCP exposure therefore does not necessarily increase after new trades. It declines if their overriding effect was to reduce members' outstanding positions.
5. *TrCrowding*: The additional impact due to changes in the correlations of member portfolio returns, beyond what is caused by changes in the correlations of security returns (as that change is captured by *RetCorr*). *TrCrowding* is therefore solely the result of position changes due to trading. If these portfolio correlations increase (in magnitude) then CCP exposure increases.¹³

In Appendix C we illustrate the decomposition of exposure changes by presenting a simple example. We discuss how the various components change when changing either price- or trade-related variables.

In-depth discussion of component identification. The identification of the components that drive exposure change in the tail ($\Delta ExpCCP$) deserves more thorough discussion. Such identification is non-trivial for essentially two reasons. First, exposure is a *non-linear* function of the various variables (e.g., security return correlations, member positions). A decomposition therefore cannot assign changes uniquely to the various components. To illustrate this point consider the following two simple functions: the linear function $f(x, y) = x + y$ and the non-linear one $g(x, y) = xy$. For f , any change can be uniquely decomposed as $\Delta f = \Delta x + \Delta y$.

For g , however, any change is non-trivial to write in terms of Δx and Δy . The approach we picked is OFAT which can decompose Δg in two ways. One can first change x and then y , yielding $[g(x + \Delta x, y) -$

¹³Note that this is a narrower definition of crowding than the one that underlies the *CrowdIx* indicator in Menkveld (2017). An increase in the correlations of security returns would lead to a higher level of *CrowdIx* because crowding in Menkveld (2017) is more broadly defined in terms of risk factors. We use the narrower definition here to distinguish between a change in security-return correlations and crowding due to position changes.

$g(x, y)] + [g(x + \Delta x, y + \Delta y) - g(x + \Delta x, y)] = [(\Delta x)y] + [(x + \Delta x)\Delta y]$ whereby the terms in square brackets correspond to the contribution of x and y , respectively. Alternatively, one can first change y and then x , yielding $[g(x, y + \Delta y) - g(x, y)] - [g(x + \Delta x, y + \Delta y) - g(x, y + \Delta y)] = [x\Delta y] + [\Delta x(y + \Delta y)]$ where the first term gets assigned to y and the second to x . In summary the OFAT decomposition in this case is:

Sequencing	x component	y component
First x , then y	$(\Delta x)y$	$x\Delta y + (\Delta x)(\Delta y)$
First y , then x	$(\Delta x)y + (\Delta x)(\Delta y)$	$x\Delta y$

Note that the interaction term $(\Delta x)(\Delta y)$ gets assigned to the component that is updated later. In economic applications there might be reasonable arguments to pick a reasonable baseline sequencing (as in our case), but it is always useful to consider all possible sequences and report lower and upper bounds to the size of each component. The wedge between the two bounds tells the researcher to what extent the decomposition critically depends on the sequencing that the researcher picked.

Second, if the objective is to study how time series Δf and Δg are driven by Δx and Δy , the identification of components for both Δf and Δg suffers from non-zero correlations between the underlying variables. Consider the case of a perfect correlation between Δx and Δy in the time series. Then any function-value changes are driven by changes in *both* x and y simultaneously. The individual contribution of each variable therefore can not be (statistically) determined. This is a genuine feature, not a flaw, of our method. The co-movement in x and y is itself an important property of the system. We will return to this issue in Section 5.1 where we study co-variation across exposure components.

3.3 Decomposition of CCP exposure level

Testing the second and third hypotheses requires a decomposition of CCP exposure levels (as opposed to exposure changes). To test whether there is more crowding at higher exposure levels, it is desirable to decompose CCP exposure across members and across securities. If one finds more concentration either across

members (member crowding) or across securities (risk-factor crowding), then there is elevated crowding as discussed in Section 2.

$ExpCCP$ being homogeneous of degree one in member portfolio volatility and in security volatility suggests a natural decomposition. Let us focus on the decomposition across members to clarify (Menkveld 2017, Section 1.5). As $ExpCCP$ is homogeneous of degree one in member portfolio risk σ_j ¹⁴, applying Euler's homogeneous function theorem yields:¹⁵

$$ExpCCP = \sum_j \sigma_j \left(\frac{\partial}{\partial \sigma_j} ExpCCP \right). \quad (11)$$

The contribution of member j therefore is:¹⁶

$$ExpCCP_j = \sigma_j \left(\frac{\partial}{\partial \sigma_j} ExpCCP \right) = \sqrt{\frac{1}{2\pi}} \sigma_j + \sum_{i \in \{J\}} \frac{\alpha}{\sigma_A} \left(\frac{\pi - 1}{2\pi} \right) \sigma_i \sigma_j M(\rho_{ij}), \quad (12)$$

where σ_A is the standard deviation of aggregate loss and M is defined in (15) in Appendix A. This result shows that member j 's contribution to $ExpCCP$ is equal to its portfolio risk σ_j times the (marginal) price of such risk in terms of CCP exposure $\frac{\partial}{\partial \sigma_j} ExpCCP$. This type of decomposition is used when testing for elevated member-crowding on high exposure levels (H2) and for verifying whether house accounts contribute more to $ExpCCP$ in these conditions (H3).

A decomposition across securities is derived analogously where the risk units are ω_k ¹⁷ instead of σ_j . A detailed derivation is included as Appendix D. This decomposition is used to test for elevated risk-factor crowding at high exposure levels (H2).

¹⁴ σ_j is the square root of the j -th diagonal element of the portfolio return covariance matrix Σ .

¹⁵Time subscripts are suppressed here for the sake of brevity.

¹⁶This equation corresponds to Menkveld (2017, equation (27)). Note that there is a typo in (27) as $\sqrt{1/(2\pi)}$ should have been multiplied by σ_j instead of σ_j^2 . This typo has been corrected in (12) below.

¹⁷ ω_k is the square root of the k -th diagonal element of the security return covariance matrix Ω .

4 Application

This *intermezzo* section presents the data and discusses various implementation issues. These issues include normality of returns (needed for *ExpCCP*), estimation of the return covariance matrix, and setting the parameter α in the delta-normal VaR.

The data sample used for testing the hypotheses was made available by the European Multilateral Clearing Facility (EMCF). EMCF, now merged with DTCC in the US to become EuroCCP, is an equity CCP for Nordic equity markets, including Denmark, Finland, and Sweden. The sample consists of trade records with time stamp, transaction size, transaction price, an (anonymized) counterparty ID, and information on whether it was a house- or client-account trade. A trade done on a house account is for a clearing member's own book whereas a client-account trade is done on behalf of its customers.¹⁸ The sample runs from October 19, 2009, through September 10, 2010, and includes trades on almost all exchanges: NASDAQ-OMX, Chi-X, Bats, Burgundy, and Quote MTF. The only exchange with Nordic trades that it did not clear was Turquoise. Turquoise, however, had a market share of less than 1% at the time.

An equity CCP insures counterparty credit risk for equity trades in the period that starts when a trade is concluded and ends when it settles. When an exchange concludes a trade, the money and the securities are not immediately transferred. Such transfer happens three days later in our sample. Should one side to the trade default in this period, the CCP inherits its position and the trade will follow through all the way to settlement.

A three-day deferred settlement is conceptually similar to a three-day forward contract between the two sides of the trade. To fix language, we therefore refer to yet-to-settle positions as “positions.” Note that these positions change overnight in the absence of any trade. This change is simply due to settlement of legacy trades and these trades are therefore removed from member positions. In other words, if a member does

¹⁸The post-crisis EMIR regulation in Europe requires a CCP to segregate trades on house accounts from those on client accounts as of 2013. Our data sample precedes this date but EMCF had already implemented such segregation.

Table 1: Summary statistics. This table presents summary statistics for the CCP data sample. Trades on house accounts are done for a clearing member’s own book. Trades on client accounts are done for clients.

<i>Panel A: General information</i>			
Number of trading days			228
Number of stocks			242
Number of accounts	House accounts		87
	Client accounts		139
	Total		226
<i>Panel B: Trade information across stocks</i>			
	Mean	Standard deviation	Median
Mean of daily number of trades	1,180	2.112	204
Mean of daily volume (shares)	797,844	2,148,216	66,286
Mean of daily volume (euro)	9,042,586	19,535,974	743,348
<i>Panel C: Trade information across clearing members (by account type)</i>			
	All accounts	House accounts	Client accounts
Mean of end-of-day position (euro)	0	-11,237	11,567
Standard deviation of end-of-day position (euro)	1,535,067	1,880,137	1,069,244
Within-member standard deviation end-of-day position (euro)	619,105	988,685	387,785

not trade for three consecutive days, his position in all equities becomes zero as all his earlier trades settled. Finally, we refer to a member’s set of open positions at any point in time as his portfolio. We emphasize that this should not be confused with a member’s portfolio in terms of its equity holdings. It simply refers to the yet-to-settle trades as these are relevant for CCP exposure since it is for these open positions that the CCP insures counterparty risk.

4.1 Data

Summary statistics. Table 1 introduces the sample by presenting various summary statistics. The sample captures trading in 242 stocks on 228 days. It contains 226 trading accounts, 87 of which are house accounts and the remaining 139 are client accounts.

The table shows that Nordic stocks are reasonably actively traded leading to substantial variation in account positions. On average stocks are traded 1,180 times per day generating an average volume of €9 million. The standard deviation in account positions is €1.5 million. The corresponding within-account standard deviation is relatively modest: €0.6 million. In other words, most variation in positions is across accounts. Separating between house and client accounts shows that house-account positions tend to be larger

in magnitude. Their standard deviation is €1.9 million whereas it is €1.1 million for client accounts. In addition, the average of end-of-day positions is zero as for every buyer there is a seller.

4.2 Implementation issues

Volume clock to recover normally distributed returns. It is well known that financial returns are not normally distributed when sampled using the wall clock. Returns exhibit negative skewness and excess kurtosis especially at high frequencies. However, the financial econometrics/microstructure literature has shown that normality of security returns can be recovered when time is measured on a volume clock as opposed to the wall clock (Clark (1973), Ané and Geman (2000), Easley et al. (2012)). When using a volume clock, security prices are sampled each time a pre-specified amount of volume has been traded. It turns out returns based on such prices are much closer to being normally distributed with less negative skewness and less excess kurtosis.

As normally distributed portfolio returns are needed for computing *ExpCCP*,¹⁹ we use a volume clock in our empirical analysis inspired by Easley et al. (2012). We set the average number of volume bins per day to 34, which corresponds to a 15-minute frequency on the wall clock as the market is open from 9:00 to 17:30. The bin size therefore is picked to be the average daily euro volume divided by 34 yielding 6770 *ExpCCP* observations. The choice for a 15-minute frequency is common in the microstructure literature as it strikes a balance between sample size and microstructure noise (Hansen and Lunde 2006). As a robustness check, we consider other frequencies as well (see Section 5.1 and Appendix E.2).

Our implementation follows the volume-clock literature except for two notable differences. First, instead of creating the clock security-by-security based on security-specific volume, we group all securities together and create the clock based on market volume. Suppose the clock starts now, then the latest prices are stacked into a vector. If the volume bin is one million euros, we wait until one million euros were traded across all

¹⁹More specifically, the conversion of portfolio-return correlations to portfolio-loss correlations is done with the M function in (15) which relies on assuming normality.

Table 2: Statistics on member portfolio returns: Wall- versus volume-clock. This table presents various statistics based on realized euro returns for member portfolios. These statistics are presented for wall-clock and volume-clock returns to assess to what extent the returns are normally distributed. The statistics include skewness, excess kurtosis, and the Jarque-Bera statistic. The latter combines the former two and is computed as $(S^2 + K^2/4)/6$, where S is skewness and K is excess kurtosis. The clock runs in 15-minute intervals for the wall-clock and for a bin size that, on average, makes a volume bin last 15 minutes. Statistics are presented for the largest five members in terms of volume, for all five pooled, and for all members pooled.

Member	Skewness		Kurtosis		Jarque-Bera	
	Wall-clock	Volume-clock	Wall-clock	Volume-clock	Wall-clock	Volume-clock
1st largest	-0.47	-0.05	15.51	1.97	10.06	0.16
2nd largest	1.96	0.19	46.60	3.15	91.12	0.42
3rd largest	1.50	0.01	30.66	3.16	39.54	0.42
4th largest	1.96	0.27	109.55	3.96	500.69	0.66
5th largest	-0.29	-0.24	8.69	3.42	3.16	0.50
Largest 5 pooled	1.01	0.03	46.79	3.20	91.38	0.43
All pooled	-0.62	-0.19	205.47	18.46	1759.19	14.20

securities, and at that moment we again stack the latest prices of all securities into a vector. Returns are then computed based the standard log-difference. The benefit of this approach is that we have a market-wide volume clock that allows calculating *ExpCCP* in volume time. Moreover, the wall clock is not completely ignored as we reset the volume clock at market open. This way the analysis avoids mixing in overnight effects and thus focuses on intraday exposures only.²⁰

To assess whether volume-clock returns are indeed closer to normal than wall-clock returns, we compare various statistics for member portfolio returns. Wall-clock returns are based on a 15-minute sampling frequency. Table 2 presents skewness, excess kurtosis, and the Jarque-Bera statistic which includes both skewness and kurtosis. Under the null of normality, these statistics are zero in expectation. These statistics are reported for the largest five clearing members, for all five pooled, and for all members pooled, respectively.

The results show strong evidence in favor of the volume-clock when returns are required to be normal. All three statistics are substantially closer to zero for each of the five largest members. When pooled, skewness drops from 1.01 to 0.03, kurtosis drops from 46.79 to 3.20, and the Jarque-Bera statistic drops from 91.38 to 0.43. Similar patterns hold when considering all members instead of the largest five only.

²⁰In case of any residual trades due to imperfect grouping at the end of each day, they are included in the last bin.

These statistics suggest that, consistent with the literature, non-normality is indeed much less of an issue for volume-clock returns.²¹

Estimation of time-varying return covariance. To account for time-varying volatility in returns, we estimate Ω_t as the exponentially weighted moving average (EWMA) of the outer product of returns. This approach is in line with standard practice (e.g., RiskMetrics and EMCF) and corresponds to estimating an IGARCH(1,1).

What remains is to pick the EWMA decay parameter. RiskMetrics uses 0.94 for their highest frequency: daily returns. As round-the-clock variance is 38 times larger than the intraday 15-minute variance we pick the decay parameter to be 0.9984 (because $0.9984^{38} = 0.94$). Ω_t is therefore calculated recursively as:²²

$$\Omega_t = (1 - 0.9984)R_{t-1}R'_{t-1} + 0.9984\Omega_{t-1}. \quad (13)$$

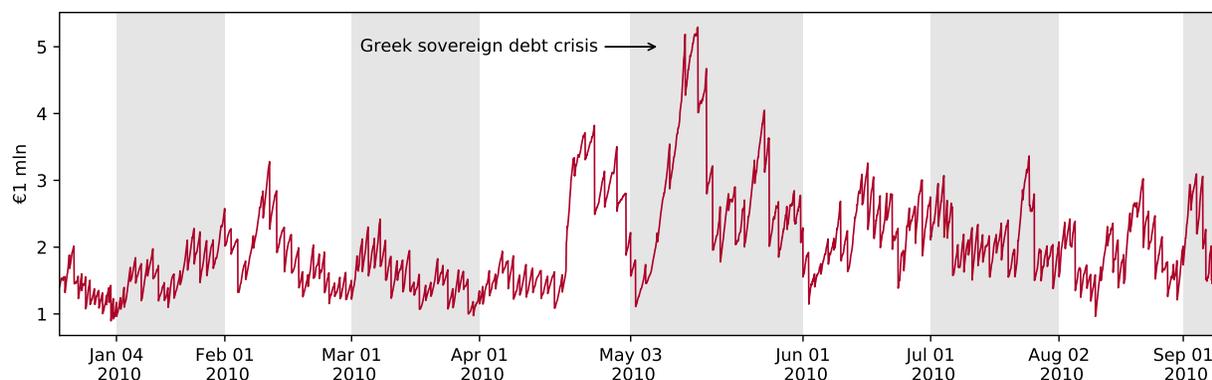
The sample used for our analysis starts on December 7, 2009, but we use data as of October 19, 2009 to have a burn-in period for Ω_t . We start off the recursion with the zero matrix but given that 0.94 corresponds to a half-life of 11 days, the effect of this choice is negligible by the time we arrive at December 7, 2009.

Pick α to make *ExpCCP* a 1% VaR. CPMI-IOSCO (2012) recommends that a CCP use a 1% VaR to set margins. We follow this lead and calibrate the alpha parameter in our delta-normal VaR to 2.5 to achieve an exceedance rate of 1%.²³

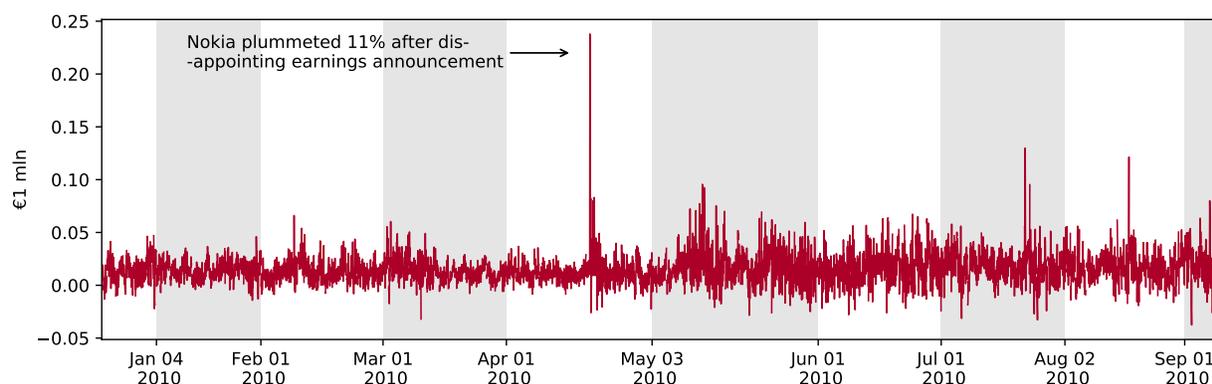
²¹Easley et al. (2012) sample E-mini future returns based on volume-clock and find similar evidence of partial recovery of normality.

²²Given that overnight return variance is about four times the variance of an intraday 15-minute period, we update the covariance matrix after an overnight return R_{t-1} by $\Omega_t = (1 - 0.9984^4)\tilde{R}_{t-1}\tilde{R}'_{t-1} + 0.9984^4\Omega_{t-1}$ where $\tilde{R}_{t-1} = R_{t-1}/\sqrt{4}$.

²³Note that aggregate loss is not normal since it is the sum of *truncated* normals.



(a) CCP exposure level



(b) CCP exposure change

Figure 1: CCP exposures, both levels and changes. This figure plots CCP exposure $ExpCCP_t$. Panel (a) plots exposure levels and Panel (b) plots exposure changes. Each shaded area corresponds to one month. A wider area indicates a higher monthly volume as the clock runs in volume time.

5 Results

In this section we first present the time series of CCP exposure. Several salient spikes will be discussed. In the three subsequent subsections we test the three hypotheses in Section 2.

Figure 1 plots the time series of CCP exposure: $ExpCCP_t$. Panel (a) plots exposure levels and shows one particularly large spike in May 2010. This turns out to be the peak month of the Greek sovereign debt crisis.²⁴ $ExpCCP$ reached €5 million that month, which means that the 1% VaR of losses across all

²⁴A review of the main events in this month is as follows. On May 5 mass protests erupted in Greece against the imposed austerity measures, with three deaths reported. This social unrest led to concerns that it could jeopardize the rescue package proposed by the European Union and the International Monetary Fund on May 2. To fund this intervention and future ones, the European Commission created the European Financial Stabilisation Mechanism on May 9 (EC 2010). On May 10, the European Central Bank announced the Securities Markets Program to address “dysfunctional” securities markets (ECB 2010).

members in the oncoming volume bin is €5 million. Although such level is about triple the average level, it is still a relatively moderate amount and will not cause a systemic crisis in and of itself. As stated in the introduction, equity CCPs are unlikely to be systemic but as CCP data is extremely scarce we are privileged to have access to such data. We believe that it is interesting to study *ExpCCP* dynamics (which is what we do in the remainder of the section) to test several hypotheses.

This result provides new evidence, from the angle of CCP exposure, on the spillover effects of the Greek sovereign debt crisis that have been extensively discussed in the literature. For example, [Mink and De Haan \(2013\)](#) find that news about the Greek bailout generally led to abnormal stock returns for European (including Nordic) banks: Positive returns for regulatory initiatives that favor banks, negative returns otherwise. [Bhanot et al. \(2014\)](#) find that Greek yield spread increases are associated with negative abnormal returns on financial stocks throughout Europe. [Beetsma et al. \(2013\)](#) document spillover effects from the Greek yield spread to those of other European countries and [Candelon et al. \(2011\)](#) find similar evidence when studying credit default swaps on sovereign debt. We will revisit the Greek crisis when decomposing *ExpCCP* in Section 5.2.

Panel (b) of Figure 1 plots exposure *changes* instead of levels. It shows that periods with high levels do not necessarily correspond to periods with extreme intraday increases. It is the latter that [CPMI-IOSCO \(2017\)](#) is particularly worried about when presenting its latest guidance on CCP risk management. The largest peak corresponds to the idiosyncratic event when Nokia announced earnings that were far below analyst expectations at noon on April 22, 2010. Its share price dropped by about 15% in subsequent minutes. Volume jumped and remained high throughout the afternoon, 400% above what volume was in the morning of that day. We revisit the Nokia event when decomposing $\Delta ExpCCP$ in Section 5.1.

Table 3: Decomposition of changes in CCP exposure. This table presents the decomposition of CCP exposure change for the full sample, the top 100, and the top 10 increases, respectively. Panel A presents the decomposition in euro. Panel B presents the same decomposition but in percentage. The five components capture changes in security return volatility (*RetVola*), security return correlations (*RetCorr*), the pricing level (*PrLevel*), members’ outstanding positions (*TrPosition*), and the crowding measure of member positions (*TrCrowding*).

	Full sample	Top 100 $\Delta ExpCCP$	Top 10 $\Delta ExpCCP$
<i>Panel A : CCP exposure change decomposition in euro</i>			
<i>RetVola</i>	272	10,949	69,311
<i>RetCorr</i>	113	3,555	-89
<i>PrLevel</i>	-133	3,195	-5,324
<i>TrPosition</i>	14,255	38,002	39,445
<i>TrCrowding</i>	443	8,186	15,571
$\Delta ExpCCP$	14,949	63,887	118,914
<i>Panel B: CCP exposure change decomposition in percentage</i>			
<i>RetVola</i>	1.8%	17.1%	58.3%
<i>RetCorr</i>	0.8%	5.6%	-0.1%
<i>PrLevel</i>	-0.9%	5.0%	-4.5%
<i>TrPosition</i>	95.4%	59.5%	33.2%
<i>TrCrowding</i>	3.0%	12.8%	13.1%
$\Delta ExpCCP$	100.0%	100.0%	100.0%

5.1 H1: The drivers of CCP exposure changes are different in the (right) tail

Hypothesis 5.1 essentially states that extremely large increases of CCP exposure are different in nature compared to regular changes. As discussed in the hypothesis development section (Section 2), they are likely to reflect a jump in volatility and elevated trading. There might also be crowding if members all tilt their portfolio to the single risk factor at the heart of the turbulence (in the later part of the section, we explore the Nokia event to illustrate). These stand in contrast to “average” changes in CCP exposure that we conjecture to mostly reflect member position changes due to trade.

To test the first hypothesis, we decompose CCP exposure changes into various components for three samples: the full sample and subsamples with the largest 100 and the largest 10 increases. Table 3 presents the decomposition results and yields the following insights. First, for the full sample exposure changes seem to be driven only by member position changes: *TrPosition* dominates all other components.

Second, when zooming in on the top 100 and top 10 $\Delta ExpCCP$, a different picture emerges. While *TrPosition* drops to 59.5% and 33.2% respectively, two other components, volatility and crowding, become much more important. Although the volatility component makes up only 1.8% of exposure changes for the

full sample, it jumps to 17.1% and 58.3% for the top 100 and top 10 increases, respectively. The crowding component is only 3.0% of exposure changes for the full sample but jumps to 12.8% and to 13.1% for the top 100 and top 10 increases, respectively.

Third, the price and correlation components remain small in the two subsamples and sometimes turn negative. Note that the components can be either positive or negative as they can either increase or reduce CCP exposure; and when scaled by the total positive exposure change ($\Delta ExpCCP$), the negative components lead to negative percentages. Importantly, the relative contribution of the various components add up to 100%.

Interestingly, the price component contributes -4.5% in the top 10 $\Delta ExpCCP$. We speculate that this result must be driven by price crash events that are typically accompanied by high volume and volatility spikes. A lower price level *per se* reduces CCP exposure, simply because CCP exposure is denominated in euro. Suppose the 1% VaR is to lose 20 cents on one euro. *ceteris paribus*, the 1% VaR would be to lose 10 cents on 50 euro cents (i.e., with price-level halved). The “exposure” dropped from 20 cents to 10 cents in this example due to a lower price level.

One, however, should not conclude that price crashes lower exposure. This goes back to our discussion of the identification of components. Price crashes might be *coupled* with volatility and positions in the sense that *conditioning* on extreme price drops, tail events for volatility or position changes become more likely. We further scrutinize the identification of the components at the end of this section with the help of CoVaR (Tobias and Brunnermeier 2016).

Overall, all of these findings support the hypothesis that extreme increases in CCP exposure are different in nature than overall changes. Specifically, while CCP exposure changes on average are almost entirely driven by member position changes, extreme ones exhibit substantial contributions from volatility changes and changes in crowding.

In Appendix E we show that our findings are robust to changing the estimate of the time-varying return

covariance and changing the sampling frequencies. One notable result worth mentioning here is that for lower frequencies the differences between the full sample and the top 10 subsample get attenuated. This highlights the importance of monitoring changes in CCP exposure at high frequencies.²⁵

Identification of the components. As discussed in Section 3.1 the identification of the various components could depend on the sequencing of the components and, in the time series, on the co-movements between components. In terms of the sequencing, in Appendix E we show that our findings are robust to changing the sequencing of the components. The analysis of co-variation in the component series, however, is not only a robustness check but also yields some economic insights and is therefore presented in the remainder of this section.

To study to what extent the components co-vary, we pick the baseline sequencing and simply compute correlations across components in the time series. Table 4 presents the results. The three strongest correlations appear in bold face: 0.57 between crowding and positions, -0.25 between price level and volatility, and -0.12 between price level and positions. The high correlation between crowding and positions is simply due to the fact that both are trade-related components and thus are driven by member position changes. The negative correlation between price level and volatility is consistent with the well documented leverage effect in the financial economics literature: Negative price shocks coincide with disproportional volatility increases.

Table 4: Correlation across $\Delta ExpCCP$ components. This table reports correlations between the decomposition components (using the baseline sequencing). Correlations that are larger in magnitude than 0.10 are in bold. *, **, and *** indicate 10%, 5%, and 1% significance levels, respectively.

	<i>RetVola</i>	<i>RetCorr</i>	<i>PrLevel</i>	<i>TrPosition</i>
<i>RetCorr</i>	0.04***			
<i>PrLevel</i>	-0.25***	0.01		
<i>TrPosition</i>	0.00	0.05***	-0.12***	
<i>TrCrowding</i>	0.08***	0.06***	-0.06***	0.57***

²⁵For completeness we also did these robustness analyses for the empirical results on the second and third hypothesis. Again, the results do not change qualitatively. To conserve space we decided to only provide those robustness results upon request.

These correlations could be driven by left-tail realizations, by right-tail realizations, or by both. The most worrying pattern to a CCP is if they are driven by tail realizations that increase its exposure, such as left-tail realizations of the price component (price crashes) and right-tail realizations of the volatility component (volatility spikes). To zoom in on adversarial tail events we turn to CoVaR which has been developed by [Tobias and Brunnermeier \(2016\)](#) to analyze systemic risk in a similar vein.

The extent to which adversarial shocks coincide can be measured by CoVaR which is defined as:

$$\Pr\left(X^j \geq \text{CoVaR}_q^{j|i} | X^i = \text{VaR}_q^i\right) = q \quad \text{with} \quad \Pr\left(X^i \geq \text{VaR}_q^i\right) = q,$$

with $q = 0.01$ for a 1% VaR, and $\text{CoVaR}_q^{j|i}$ is the 1% VaR of variable j conditional on variable i being at its 1% VaR level. We compare the CoVaR derived directly from our sample (i.e., sample CoVaR) to the CoVaR that is implied by the two variables being Gaussian (i.e., Gaussian CoVaR). The difference in magnitude between the two serves to measure the tail-dependence between the variables, benchmarked against the normal distribution.

Note that contrary to the definition of standard VaR we use \geq (instead of \leq) as exposures are defined in terms of losses which are positive numbers. Thus, we focus on the right-tail realizations of the components. The only exception is *PrLevel* for which we use \leq as an adversarial event, as price crashes are left-tail realizations of the price component. Thus, the tail events are large *increases* of volatility, return-correlations, positions, and crowding, and large *decreases* of the price level.

Table 5 presents the sample CoVaR, Gaussian CoVaR, and the difference in magnitude between the two. Note that for the price component, the CoVaRs are negative as its left-tail realizations are adversarial to the CCP. Highlighted in green are the sample CoVaRs with largest absolute value in each column. This focuses attention on the strongest tail-dependence between the variables. The highlighting shows that in five out of six cases, it is the large price drop that, when conditioned on, leads to strongest tail-dependence in the

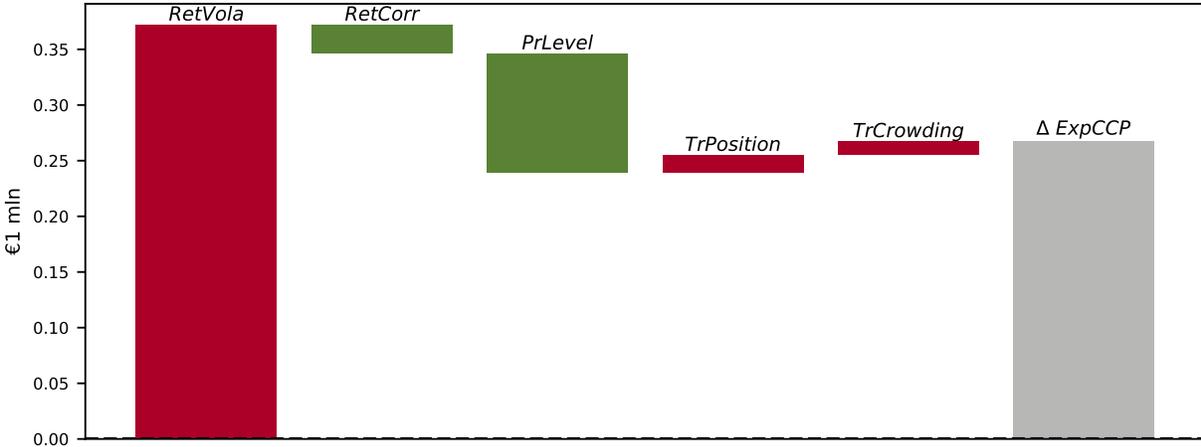
Table 5: CoVaR across *ExpCCP* components. This table reports the CoVaR between the components. CoVaR_q^{ji} is reported in row i and column j (i.e., the row variables are conditioned on). It measures the extent to which components exhibit coupling effects in the sense that tail events co-occur. We report the sample CoVaR along with a Gaussian CoVaR which is what CoVaR would have been had the distribution been normal (calibrated to the pair’s mean and covariance). We also report the difference in magnitude between the two, defined as $\text{Sign}(\text{Sample CoVaR})(\text{Sample CoVaR} - \text{Gaussian CoVaR})$. Highlighted in **green** are the largest sample CoVaRs in absolute value within a column. Highlighted in **yellow** are the largest differences in magnitudes when comparing the sample CoVaR with the Gaussian CoVaR (within a column).

		<i>RetVola</i>	<i>RetCorr</i>	<i>PrLevel</i>	<i>TrPosition</i>	<i>TrCrowding</i>
<i>RetVola</i>	Gaussian CoVaR		4,101	-12,744	22,471	9,323
	Sample CoVaR		12,409	-24,062	52,143	12,159
	Difference in magnitude		8,308	11,318	29,672	2,835
<i>RetCorr</i>	Gaussian CoVaR	12,856		-12,419	23,463	9,201
	Sample CoVaR	9,767		-17,925	48,447	10,390
	Difference in magnitude	-3,089		5,506	24,984	1,190
<i>PrLevel</i>	Gaussian CoVaR	17,446	5,423		26,254	9,967
	Sample CoVaR	47,799	12,806		63,408	22,320
	Difference in magnitude	30,353	7,383		37,154	12,353
<i>TrPosition</i>	Gaussian CoVaR	12,454	4,148	-10,629		12,042
	Sample CoVaR	11,114	9,003	-21,671		17,128
	Difference in magnitude	-1,341	4,855	11,042		5,086
<i>TrCrowding</i>	Gaussian CoVaR	13,372	4,210	-10,442	31,161	
	Sample CoVaR	13,621	10,448	-21,829	52,301	
	Difference in magnitude	250	6,238	11,387	21,140	

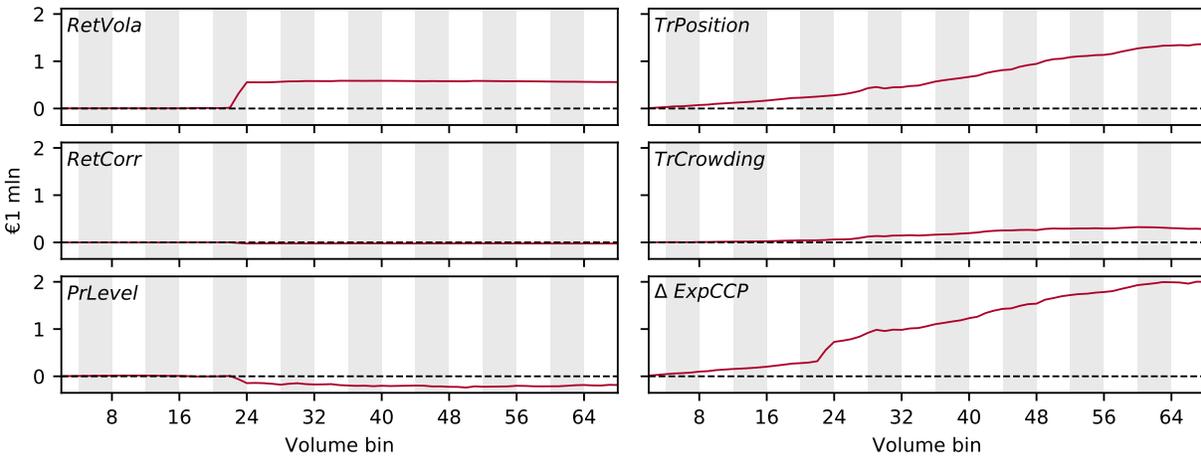
other components. Nonetheless, for price level itself, it is large volatility increases that lead to its strongest tail-dependence.

Highlighted in yellow is for each column the largest difference in magnitude between sample CoVaR and Gaussian CoVaR. Again, in most cases (four out of six), the wedge is largest when a price drop is conditioned on. Price crashes seem to “trigger” the strongest adversarial co-variation with the other components. This finding itself is consistent with the fire-sales dynamics which was one of the channels that motivate the first hypothesis. Although the findings are suggestive of causality, we caution that one cannot make any causal statements.

To illustrate these general findings, Figure 2 zooms in on the Nokia event. Panel (a) decomposes the exposure jump of €0.24 million immediately following Nokia’s disappointing announcement. A couple of features stand out. First, return volatility is by far the largest component: €0.30 million. Its effect is moderated by the negative price-level component: €-0.06 million. In other words, Nokia volatility spikes



(a) Decomposition of $\Delta ExpCCP$ for bin 23 on April 22, 2010, 12:02:18 - 12:05:05



(b) Decomposition of $\Delta ExpCCP$ for all volume bins on April 22, 2010

Figure 2: Decomposition of the largest CCP exposure increase: The Nokia event. At noon on April 22, Nokia announced disappointing earnings which caused a large price drop of 15% in a few minutes and a sharp increase in trading volume. CCP exposure rose steeply in the volume bin subsequent to the announcement. Panel (a) decomposes this exposure increase into five components: security return volatility (*RetVola*), security return correlation (*RetCorr*), price level (*PrLevel*), position changes (*TrPosition*), and the extent of crowding in member positions (*TrCrowding*). Panel (b) zooms out and cumulates these components for the full day.

due to a large negative return of about -15%, but relative volatility applies at a lower price level because of the negative return. Finally, the trade components are both positive implying that on average traders expand their positions in a way that leads to more crowding. These trade components are, however, dwarfed by the volatility component.

Panel (b) zooms out and shows how exposure built up throughout the day. Its most salient feature is that

while the volatility spike dominates exposure change in the volume bin right after the event, it is only about a fifth of that day's exposure increase. The reason is that volatility is only a major component in the bin just after the event, trade components dominate subsequent bins. The high volume in the afternoon therefore turns out to be due to traders expanding their positions, not reducing them. There is also elevated crowding but its contribution is only about 20% of the total contribution of trade components. Finally, traders do not seem to take substantial positions *ahead* of the Nokia announcement as all components only start to contribute substantially in the afternoon.

Perhaps the most important message of these Nokia results is that firm-specific shocks can have systemic impact through heightened CCP exposure. News that strikes like lightning causes volatility to spike and, more importantly, makes traders expand their positions in ways that lead to more concentration in their portfolios (i.e., crowding).

5.2 H2: The structure of CCP exposure levels is different in the (right) tail

The second hypothesis focuses on the highest exposure *levels* as opposed to the largest changes. Does one see evidence of elevated exposure concentration (i.e., crowding) either across members, across (a combination of) stocks, or across both? Such finding would raise concerns about market conditions that are potentially prone to fire-sale dynamics.

To verify whether the structure of CCP exposure is different in the tail, we decompose exposure for the full sample and for the subsamples of the top 10% and the top 1% CCP exposure levels. The reason for picking the top 10% here instead of the top 100 used in the previous subsection is that CCP exposure levels are very persistent as compared to exposure changes. The top 100 subsample is smaller than the top 10% sample and, therefore, when used in the level analysis it would essentially point to the same period of time. The same argument applies to picking the top 1% instead of the top 10. The decomposition is done both across members and across stocks. We then compute the Herfindahl-Hirschman Index (HHI) along with

Table 6: Decomposition of CCP exposure across members and across stocks. This table presents the results of decomposing CCP exposure levels across members and across stocks for the full sample and for the top 10% and top 1% subsamples. Various concentration measures are reported: the share of the member/stock with the largest contribution, the five largest contributors, and the 10 largest contributors. The table further reports the Herfindahl-Hirschman Index (HHI).

	Full sample	Top 10% <i>ExpCCP</i>	Top 1% <i>ExpCCP</i>
<i>Panel A: Decomposition of CCP exposure across traders</i>			
Top 1 member	9.3%	14.4%	25.5%
Top 5 members	27.8%	34.9%	46.8%
Top 10 members	41.7%	48.2%	57.3%
Herfindahl-Hirschman Index (HHI)	0.030	0.046	0.085
<i>Panel B: Decomposition of CCP exposure across stocks</i>			
Top 1 stock	18.7%	28.0%	16.1%
Top 5 stocks	43.3%	48.9%	41.1%
Top 10 stocks	59.3%	62.6%	57.3%
Herfindahl-Hirschman Index (HHI)	0.080	0.176	0.053

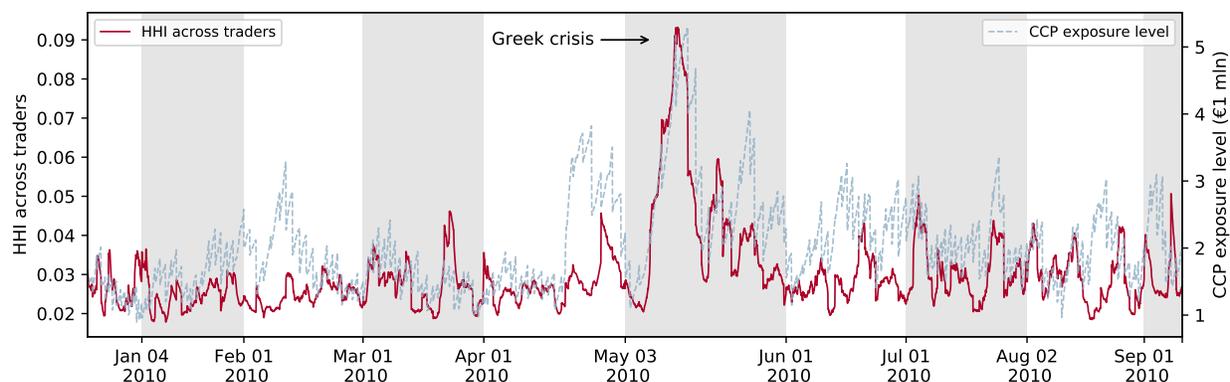
Table 7: Principal component analysis of member portfolio returns. This table uses principal component analysis to characterize the commonality in member portfolio returns for the full sample and for subsamples where CCP exposure levels are large. It reports the explained variation of the first, the second, and the third principal component along with the sum of these three.

	Full sample	Top 10% <i>ExpCCP</i>	Top 1% <i>ExpCCP</i>
PC1	7.8%	20.8%	37.6%
PC2	5.2%	8.9%	10.8%
PC3	2.7%	6.4%	6.2%
PC1+PC2+PC3	15.7%	36.0%	54.7%

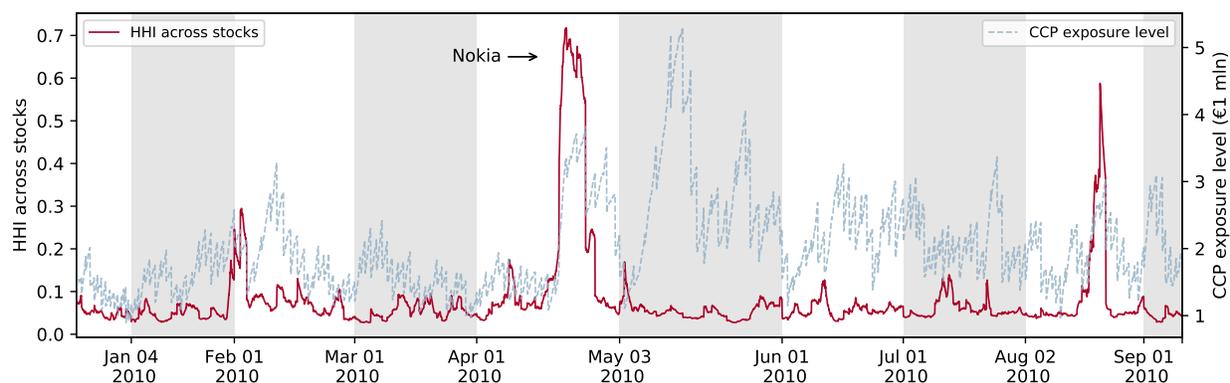
shares of the largest 1, 5, and 10 contributors to measure the concentration level.

Table 6 reveals that concentration is elevated in the tail for members, but not for individual stocks. The shares of the top 1, 5, and 10 members increase substantially from the full sample to the top 1% subsample. For example, the share of the top 5 members increases from 27.8% in the full sample to 34.9% in the top 10% subsample, and to 46.8% in the top 1%. The HHI shows a similar trend and increases from 0.030 to 0.046 and 0.085, respectively. There is no such trend for the decomposition across stocks. The share of the top five stocks, for example, stays rather flat. It changes from 43.3% in the full sample to 48.9% and 41.1% in the top 10% and the top 1%, respectively.

The unchanged concentration for the decomposition across stocks does not preclude crowding in a particular *portfolio* of stocks. To study whether this is the case, we apply principal component analysis (PCA) on member portfolio returns for the full sample and for both subsamples. Table 7 shows that there does



(a) Herfindahl-Hirschman Index (HHI) of decomposition across members



(b) Herfindahl-Hirschman Index (HHI) of decomposition across stocks

Figure 3: CCP exposure concentration across members and across stocks. This figure plots the Herfindahl-Hirschman Index (HHI) of CCP exposure decomposed across members in Panel (a), and across stocks in Panel (b) in solid lines (left y-axis). The plots also show the level of CCP exposure in dashed lines (right y-axis).

appear to be elevated crowding in the subsamples. It is strongest for the first principal component (PC1) whose share in total variance increases from 7.8% in the full sample to 20.8% in the top 10% subsample and to 37.6% in the top 1% subsample. As the largest CCP exposures occur mostly in the Greek crisis period, it is likely that this component captures a market effect. To verify, we compute the correlation of PC1 with the local market index and indeed find the expected pattern: it is 0.43 for the full sample, 0.86 for the top 10% subsample, and 0.98 for the top 1% subsample.

Finally, to illustrate these results graphically Figure 3 plots the HHI for both the across-member and across-stock decompositions (See Table 6). Panel (a) plots the across-member HHI in solid red and overlays the CCP exposure level in dashed blue (using the second y-axis). It illustrates that high concentration occurs

Table 8: Decomposition of CCP exposure into house and client accounts. Panel A decomposes CCP exposure into house and client accounts. Panel B shows the concentration of CCP exposure *within* each account type by means of the Herfindahl-Hirschman Index (HHI). Both panels consider the full sample and subsamples of the top 10% and the top 1% CCP exposure levels.

	Full sample	Top 10% <i>ExpCCP</i>	Top 1% <i>ExpCCP</i>
<i>Panel A: Contribution to CCP exposure by account type</i>			
Contribution by house accounts (%)	66.8%	66.0%	69.7%
Contribution by client accounts (%)	33.2%	34.0%	30.3%
<i>Panel B: Hirsch-Herfindahl Index (HHI) within account type</i>			
Herfindahl-Hirschman Index (HHI) within house accounts	0.051	0.083	0.160
Herfindahl-Hirschman Index (HHI) within client accounts	0.068	0.071	0.081

mostly in the Greek crisis period. Panel (b) plots the across-stock HHI and, as expected, shows that it stays rather flat at times where CCP exposure peaks. This does not mean that concentration remains at the same level throughout. It does show a large peak around the Nokia event when exposure *increase* is the largest as analyzed in the previous subsection. Upon further inspection we unsurprisingly find that the concentration occurs in the stock of Nokia.

5.3 H3: The relative contribution of house accounts increases in the (right) tail

The third hypothesis states that the relative contribution of house accounts is higher for extreme CCP exposure levels. This is potentially worrisome as clearing members are highly leveraged financial institutions.

Table 8 presents evidence largely rejecting the third hypothesis. The decomposition across house and client accounts in Panel A shows that house accounts contribute 66.8% to CCP exposure in the full sample. This contribution, however, hardly changes when measured for top 10% subsample (66.0%) and increases only mildly to 69.7% in the top 1% subsample.

Panel B shows that in spite of the relative contribution of all house accounts combined being rather flat across subsamples, there is concentration *within* house accounts. The HHI computed based on each member's contribution to the total of house-account contributions increases from 0.051 for the full sample to 0.083 for the top 10% and to 0.160 for the top 1%. The results suggest that in stressed markets the positions in the books of some clearing members expand while the positions of others shrink. This causes

their total contribution to CCP exposure to remain unchanged, yet there is more concentration within house accounts.

There appears to be no such pattern for client accounts whose collective contribution remains flat across the three samples but also the within-client concentration remains largely unchanged. The HHI is 0.068 for the full sample, 0.071 for the top 10% subsample, and 0.081 for the top 1% subsample.

In sum, the significantly higher concentration within house accounts is potentially worrisome. Most clearing members are highly leveraged sell-side banks who, if trading for speculative reasons, might default on their position if they turn out to be on the wrong side of the bet. Given that they seem to crowd on the same (set of) risk factors, there might be multiple members that are heavily under water on their bets at the same time. Admittedly, it is unlikely that they default on their equity trades, but if the pattern carries over to CCPs that clear interest rate derivatives or credit default swaps, then such pattern does become a systemic worry.

6 Conclusion

In summary, we test three hypotheses about the exposure a CCP has vis-à-vis its clearing members. All three hypotheses focus on tail events and whether or not the nature of CCP exposure changes in such cases. The academic literature has emphasized elevated concentration (i.e., crowding) in such stressed markets with a risk of fire-sale price dynamics.

We develop an approach for monitoring CCP exposure whereby both exposure *levels* and exposure *changes* can be decomposed to identify the relative contribution of various factors. The empirical results support the hypotheses that the nature of exposure levels or exposure changes is different in the tail: There is indeed more crowding in stressed markets. The hypothesized larger contribution of house accounts to total exposure in such conditions is not supported by the data. However, *within* house accounts there is more concentration with few clearing members contributing a disproportionate amount to total house-account

exposure.

Our findings suggest that CCP executives and regulators should monitor at high frequencies with a particular focus on tail events. Whether or not contingency planning is needed and if so, what form it should take, is for future research. We, however, believe that the approach we developed is useful for monitoring CCP exposure at high frequencies. The proposed decomposition of exposure changes helps CCPs and regulators diagnose sudden large jumps in exposure. As all results are analytic (thus avoiding heavy-duty simulations), the approach can be implemented in real-time. This we believe is an asset in today's extremely fast markets.

Appendix

A Results needed to compute *ExpCCP*

Let L_t be the $J \times 1$ vector that stacks all $L_{j,t}$. Since $A_t = \sum_j L_{j,t}$, one needs to compute $E(L_t)$ and $\text{var}(L_t)$ to evaluate (4). Following [Menkveld \(2017, Proposition 1\)](#) yields the following two results:

$$\begin{aligned} E(L_t) &= \mu_t, & \mu_{j,t} &= \sqrt{\frac{1}{2\pi}} \sigma_{j,t}, \\ \text{var}(L_t) &= \Psi_t, & \psi_{ij,t} &= \frac{\pi-1}{2\pi} \sigma_{i,t} \sigma_{j,t} M(\rho_{ij,t}), \end{aligned} \quad (14)$$

where $\sigma_{ij,t}$ is the (i, j) -th element of the covariance matrix of member portfolio returns Σ_t , $\sigma_{i,t}$ is short for $\sigma_{ii,t}^{\frac{1}{2}}$, and $\rho_{ij,t} = \sigma_{ij,t} / \sigma_{i,t} \sigma_{j,t}$. The function

$$M(\rho) = \left[\left(\frac{1}{2} \pi + \arcsin(\rho) \right) \rho + \sqrt{1 - \rho^2} - 1 \right] / (\pi - 1) \quad (15)$$

maps portfolio return correlations into portfolio loss correlations. Detailed proofs are in [Menkveld \(2017\)](#).

ExpCCP can now be written explicitly as:

$$\text{ExpCCP}_t = \sum_j \sqrt{\frac{1}{2\pi}} \sigma_{j,t} + \alpha \left(\sum_i \sum_j \frac{\pi-1}{2\pi} \sigma_{i,t} \sigma_{j,t} M(\rho_{ij,t}) \right)^{\frac{1}{2}}. \quad (16)$$

B Decomposition of CCP exposure change

This section presents the various components that add up to CCP exposure change:

$$\Delta \text{ExpCCP}_t = \underbrace{\text{RetVola}_t + \text{RetCorr}_t + \text{PrLevel}_t}_{\text{Price components}} + \underbrace{\text{TrPosition}_t + \text{TrCrowding}_t}_{\text{Trade components}}. \quad (17)$$

Price components. The three price components are:

$$\begin{aligned} RetVola_t = & f\left(D\left(\mathbf{D}_{\Omega_t}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right), R\left(\mathbf{D}_{\Omega_t}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right)\right) \\ & - f\left(D\left(D_{\Omega_{t-1}}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right), R\left(D_{\Omega_{t-1}}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right)\right), \end{aligned} \quad (18)$$

$$\begin{aligned} RetCorr_t = & f\left(D\left(D_{\Omega_t}, \mathbf{R}_{\Omega_t}, P_{t-1}, \tilde{N}_{t-1}\right), R\left(D_{\Omega_t}, \mathbf{R}_{\Omega_t}, P_{t-1}, \tilde{N}_{t-1}\right)\right) \\ & - f\left(D\left(D_{\Omega_t}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right), R\left(D_{\Omega_t}, R_{\Omega_{t-1}}, P_{t-1}, \tilde{N}_{t-1}\right)\right), \text{ and} \end{aligned} \quad (19)$$

$$\begin{aligned} PrLevel_t = & f\left(D\left(D_{\Omega_t}, R_{\Omega_t}, \mathbf{P}_t, \tilde{N}_{t-1}\right), R\left(D_{\Omega_t}, R_{\Omega_t}, \mathbf{P}_t, \tilde{N}_{t-1}\right)\right) \\ & - f\left(D\left(D_{\Omega_t}, R_{\Omega_t}, P_{t-1}, \tilde{N}_{t-1}\right), R\left(D_{\Omega_t}, R_{\Omega_t}, P_{t-1}, \tilde{N}_{t-1}\right)\right). \end{aligned} \quad (20)$$

Trade components. The two trade components are:

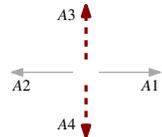
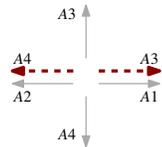
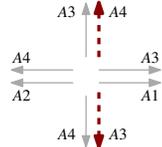
$$\begin{aligned} TrPosition_t = & f\left(D\left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_t\right), R\left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_{t-1}\right)\right) \\ & - f\left(D\left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_{t-1}\right), R\left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_{t-1}\right)\right) \text{ and} \end{aligned} \quad (21)$$

$$\begin{aligned} TrCrowding_t = & f\left(D\left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_t\right), R\left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_t\right)\right) \\ & - f\left(D\left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_t\right), R\left(D_{\Omega_t}, R_{\Omega_t}, P_t, \tilde{N}_{t-1}\right)\right). \end{aligned} \quad (22)$$

C Example of CCP exposure change analysis

Table 9 presents a simple example to illustrate the insights that one can get from a decomposition of CCP exposure changes. Suppose there are four agents ($A1, A2, A3, A4$) and two securities ($S1$ and $S2$) that cost €1 and have returns that are standard normal and mutually independent at least at the beginning of time. All agents start with a zero position in the securities. To illustrate real-time CCP exposure monitoring we consider a particular sequence of events. We compute CCP exposure change after each event and present its decomposition. This controlled setting serves to familiarize with the approach before implementing it on

Table 9: Simple example to illustrate the decomposition of CCP exposure changes. This example illustrates how the one-factor-at-a-time decomposition approach identifies the different components in CCP exposure changes. There are four agents ($A1, A2, A3, A4$) and two securities ($S1, S2$). Arrows denote positions in these securities. Arrows right and left illustrate long and short positions in $S1$, respectively, arrows up and down illustrate long and short positions in $S2$, respectively. Red dashed arrows correspond to new trades. CCP exposures are computed with $\alpha = 2.5$, which is the calibrated value based on our real-world sample (see Section 4.2).

t	Trades/changes	$ExpCCP_t$	$\Delta ExpCCP_t = RetVolat_t + RetCorr_t + PrLevel_t + TrPosition_t + TrCrowding_t$					
0	$\sigma_1 = \sigma_2 = 1,$ $\rho = 0, p_1 = p_2 = 1.$	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1		2.3	2.3	0.0	0.0	0.0	2.9	-0.6
2		3.7	1.4	0.0	0.0	0.0	1.8	-0.4
3	Volatility changes from $\sigma_1 = \sigma_2 = 1$ to $\sigma_1 = 2, \sigma_2 = 1.$	5.7	2.0	2.0	0.0	0.0	0.0	0.0
4	Return correlation changes from $\rho = 0$ to $\rho = 0.5.$	6.0	0.3	0.0	0.3	0.0	0.0	0.0
5	Price level changes from $p_1 = p_2 = 1$ to $p_1 = 0.5, p_2 = 1.$	3.9	-2.1	0.0	0.0	-2.1	0.0	0.0
6		6.7	2.8	0.0	0.0	0.0	1.5	1.3
7		4.6	-2.1	0.0	0.0	0.0	-2.0	-0.1

real-world data.

The first two columns of Table 9 describe the sequence of events. CCP exposure is computed after each event based on the loss distribution for the oncoming period. In some cases, events are illustrated by horizontal arrows that correspond to positions in the first security. Arrows that point right denote long positions. Left arrows denote short positions. Vertical arrows correspond to positions in the second security. Up arrows denote long positions. Down arrows denote short positions. The remaining columns show CCP exposure, its change, and the decomposition of this change into the five factors. These changes and decompositions are discussed below.

- $t = 0$. CCP exposure is 0 for the simple reason that none of agents has a position.
- $t = 1$. $A1$ entered a long position of one unit on $S1$ and $A2$ is on the opposite side of that trade. CCP exposure becomes €2.3. The decomposition shows that €2.9 is due to expanded positions (*TrPosition*) and the crowding component is €-0.6 (*TrCrowding*). The reason for this negative crowding term is simply that in this case the members have taken the opposite side of the same trade and their portfolio returns are therefore perfectly negatively correlated.
- $t = 2$. $A3$ entered a long position of one unit in $S2$ with $A4$ taking the short side. CCP exposure increases by €1.4 to €3.7. The decomposition shows a positive *TrPosition* of €1.8 and a negative *TrCrowding* of €-0.4. The positive position risk is due to the new trade leading to larger positions. Furthermore, the new trade between $A3$ and $A4$ is in $S2$ and therefore orthogonal to the positions between $A1$ and $A2$. In other words, the new trade between $A3$ and $A4$ lowers the correlations between member portfolio returns. Hence, there is less crowding now than before.
- $t = 3$. The return volatility of $S1$ increased from 1 to 2. CCP exposure increases by €2.0 to €5.7. The decomposition indeed attributes it to the volatility component (*RetVola*).
- $t = 4$. The correlation between the returns of $S1$ and $S2$ increased from 0 to 0.5. CCP exposure

increases by €0.3 to €6.0. The decomposition assigns it to the correlations component (*RetCorr*).

- $t = 5$. The price of *SI* drops from €1 to €0.5. CCP exposure drops by €2.1 which is completely assigned to the price level (*PrLevel*). This is simply the result of volatility being defined in relative terms. If it does not change, but the price level drops then the VaR which is expressed in *euro* drops.
- $t = 6$. *A3* traded again with *A4* but this time he entered a one-unit long position in *SI* where *A4* takes the short side. CCP exposure increases by €2.8 to €6.7. Positions now crowd on the risk factor *SI*. The decomposition assigns €1.3 of the increase to *TrCrowding* and the remaining €1.5 to *TrPosition*.
- $t = 7$. *A3* and *A4* effectively undid their first trade by entering a reverse trade. In this reverse trade *A3* is long one unit of *S2* and *A4* is short one unit. CCP exposure declines by €2.1 to €4.6. The decomposition shows that most of the decrease is due to a reduction in outstanding (net) positions (i.e., the drop is largely assigned to *TrPosition*). This event shows that trade does not necessarily imply more exposure, it could *reduce* exposure when, after the trade, positions shrink. Note that combining $t = 6$ and $t = 7$ the *size* of trade positions have not changed — members are long or short the same amount of risk — but CCP exposure has increased due crowding.

In summary, the decompositions of CCP exposure changes generate insight into the drivers of these changes. *TrPosition* picks up whether new trades extend or reverse legacy positions. *TrCrowding* captures the correlation of member portfolio returns. *RetVola*, *RetCorr*, and *PrLevel* identify exposure changes due to changes in the volatility of returns, their correlations, and price levels, respectively.

D Decomposition of CCP exposure across securities

$ExpCCP$ being homogeneous of degree one in ω_k yields:²⁶

$$ExpCCP = \sum_i \omega_k \left(\frac{\partial}{\partial \omega_k} ExpCCP \right). \quad (23)$$

The contribution of security k therefore is:

$$\begin{aligned} ExpCCP_k &= \sum_{i,j} \omega_k \left(\frac{\partial}{\partial \omega_k} ExpCCP \right) \\ &= \sum_j \sqrt{\frac{1}{2\pi}} \frac{B_{jj}}{2\sigma_j} + \\ &\quad + \frac{\alpha}{2\sigma_A} \sum_{i,j} \left(\frac{\pi-1}{2\pi} \right) \left(M'(\rho_{ij}) B_{ij} + \frac{\sqrt{1-\rho_{ij}^2}-1}{\pi-1} \left(\frac{\sigma_j}{2\sigma_i} B_{ii} + \frac{\sigma_i}{2\sigma_j} B_{jj} \right) \right), \end{aligned} \quad (24)$$

where

$$B_{ij} = n'_i \frac{\partial \Omega}{\partial \omega_k} n_j, \quad M'(\rho_{ij}) = \frac{\frac{1}{2}\pi + \arcsin(\rho_{ij})}{\pi-1}. \quad (25)$$

E Robustness checks

E.1 Moving-window return covariance estimate

The exposure change decomposition analysis presented in Table 3 relies on a EWMA estimate of the covariance matrix of returns. To verify whether the results are robust we redo the analysis with a rolling-window estimate of return covariance. For the length of the window we picked the burn-in period used for EWMA (i.e., 50 days). We have considered other alternatives such as parametric estimation of the time-varying covariance matrix. One natural approach is to estimate a multivariate GARCH but implementation is infeasible given the large dimensions of the covariance matrix that needs to be estimated: 242×242 . We therefore

²⁶Note that each element ω_{ij} of the covariance matrix Ω can be written as $\rho_{ij}\omega_i\omega_j$ where ρ_{ij} denotes the elements of the accompanying correlation matrix. This should clarify what homogeneity or a partial derivative with respect to ω_k is.

Table 10: Decomposition of exposure change for a rolling-window estimate of return covariance. This table repeats the exposure-change decompositions reported in Table 3 and adds decompositions based a 50-day rolling-window estimate of return covariance instead of the EWMA estimate used in the baseline decompositions.

	EWMA estimate of Cov(R)			Rolling-window estimate of Cov(R)		
	Full sample	Top 100	Top 10	Full sample	Top 100	Top 10
<i>Panel A : CCP exposure change decomposition in euro</i>						
<i>RetVola</i>	272	10,949	69,311	-414	5,156	24,953
<i>RetCorr</i>	113	3,555	-89	-22	553	-1,225
<i>PrLevel</i>	-133	3,195	-5,324	-168	4,964	-525
<i>TrPosition</i>	14,255	38,002	39,445	18,956	59,148	80,765
<i>TrCrowding</i>	443	8,186	15,571	624	11,388	20,255
<i>ΔExpCCP</i>	14,949	63,887	118,914	18,976	81,208	124,223
<i>Panel B: CCP exposure change decomposition in percentage</i>						
<i>RetVola</i>	1.8%	17.1%	58.3%	-2.2%	6.3%	20.1%
<i>RetCorr</i>	0.8%	5.6%	-0.1%	-0.1%	0.7%	-1.0%
<i>PrLevel</i>	-0.9%	5.0%	-4.5%	-0.9%	6.1%	-0.4%
<i>TrPosition</i>	95.4%	59.5%	33.2%	99.9%	72.8%	65.0%
<i>TrCrowding</i>	3.0%	12.8%	13.1%	3.3%	14.0%	16.3%
<i>ΔExpCCP</i>	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

stick to a parameter-free estimate but this time based it on a rolling window.

Table 10 shows that decomposition results when using a rolling-window estimate are similar to the ones using an EWMA estimate. Importantly, the key observations in the main text all hold up: The position component dominates all other components for the full sample, but volatility and crowding become much more important when considering only the top 100 and the top 10 exposure changes.

E.2 Alternative sampling frequencies

Is high-frequency analysis important for the decomposition results presented in Table 3? Note that the volume bins were chosen such that, on average, they span fifteen minutes. A higher frequency is computationally feasible but economically impossible as “microstructure noise” starts to bias return covariance estimates (Andersen et al. 2003). Lower frequency, however, is possible and in this section we redo the decomposition based on volume bins that, on average, span 30 minutes or a full hour.

Table 11 presents the results but only reports full-sample and top 10 decompositions to save space. The table shows that the main results are unaffected: the position component dominates in the full sample, but volatility and crowding become important in top 10 subsample. These results, however, become attenuated

Table 11: Decomposition of exposure change for different frequencies. This table repeats the exposure-change decompositions of Table 3 and adds decompositions based on lower frequencies. The baseline result is based on having, on average, 34 volume bins per day which corresponds to 15-minute intervals. The added frequencies are 17 and 8 and therefore correspond to 30-minute and 1-hour intervals, respectively.

	Baseline: 34 bins per day (15-minute intervals)		17 bins per day (30-minute intervals)		8 days per day (1-hour intervals)	
	Full sample	Top 10	Full sample	Top 10	Full sample	Top 10
<i>Panel A : CCP exposure change decomposition in euro</i>						
<i>RetVola</i>	272	69,311	984	89,104	3,881	276,342
<i>RetCorr</i>	113	-89	316	14,133	683	26,155
<i>PrLevel</i>	-133	-5,324	-351	-20,163	-1,603	-24,318
<i>TrPosition</i>	14,255	39,445	38,730	101,854	123,654	327,711
<i>TrCrowding</i>	443	15,571	1,279	22,431	5,052	77,654
<i>ΔExpCCP</i>	14,949	118,914	40,959	207,359	131,667	683,545
<i>Panel B: CCP exposure change decomposition in percentage</i>						
<i>RetVola</i>	1.8%	58.3%	2.4%	43.0%	2.9%	40.4%
<i>RetCorr</i>	0.8%	-0.1%	0.8%	6.8%	0.5%	3.8%
<i>PrLevel</i>	-0.9%	-4.5%	-0.9%	-9.7%	-1.2%	-3.6%
<i>TrPosition</i>	95.4%	33.2%	94.6%	49.1%	93.9%	47.9%
<i>TrCrowding</i>	3.0%	13.1%	3.1%	10.8%	3.8%	11.4%
<i>ΔExpCCP</i>	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

when the analysis is done at the lower frequency. That is, the contribution of volatility and crowding drops in the top 10 subsample. This result testifies to the importance of high-frequency analysis of CCP exposure changes to diagnose the nature of trading during brief spells of volatility spikes and extreme volume.

E.3 Alternative sequencing in exposure change decomposition

The decomposition of CCP exposure change presented in Table 3 and discussed in Section 5.1 critically depends on the sequencing of the various components. To verify how robust the decomposition results are to alternative sequences, we redo the analysis across all possible alternatives inspired by Hasbrouck (1995). As the components belong to two groups (that are preserved in the sequencing) we end up with $2 \times 3! \times 2! = 24$ possible sequences.

The results in Table 12 show that the decomposition results appear robust. The table reports the mean, the lower and the upper bound of each component's contribution across all 24 sequences. The distance between the lower and upper bounds seems small as it is only a few percentage points for the relative shares reported in Panel B, never exceeding 6%. The key observations in the main text all hold up: The position

Table 12: Decomposition of exposure change for alternative component sequences. This table presents the mean and, in brackets, the lower and the upper bound of the (relative) share of components across alternative sequences of the various components. It serves as a robustness check for Table 3 which is based on a particular economically motivated sequence. The price and trade variables are kept together as a group so the number of sequences considered is $2 \times 3! \times 2! = 24$.

	Full sample	Top 100 $\Delta Exp CCP$	Top 10 $\Delta Exp CCP$
<i>Panel A : CCP exposure change decomposition in euro</i>			
<i>RetVola</i>	275 (263, 288)	11,003 (10,581, 11,427)	69,022 (65,622, 72,392)
<i>RetCorr</i>	115 (112, 118)	3,612 (3,555, 3,669)	215 (-93, 534)
<i>PrLevel</i>	-132 (-136, -128)	3,363 (3,171, 3,555)	-3,619 (-5,390, -1,881)
<i>TrPosition</i>	14,598 (14,245, 14,951)	38,656 (37,609, 39,723)	39,875 (37,246, 42,661)
<i>TrCrowding</i>	93 (-253, 439)	7,253 (6,347, 8,180)	13,421 (11,435, 15,565)
$\Delta Exp CCP$	14,949	63,887	118,914
<i>Panel B: CCP exposure change decomposition in percentage</i>			
<i>RetVola</i>	1.8% (1.8%, 1.9%)	17.2% (16.6%, 17.9%)	58.0% (55.2%, 60.9%)
<i>RetCorr</i>	0.8% (0.8%, 0.8%)	5.7% (5.6%, 5.7%)	0.2% (-0.1%, 0.4%)
<i>PrLevel</i>	-0.9% (-0.9%, -0.9%)	5.3% (5%, 5.6%)	-3.0% (-4.5%, -1.6%)
<i>TrPosition</i>	97.7% (95.3%, 100%)	60.5% (58.9%, 62.2%)	33.5% (31.3%, 35.9%)
<i>TrCrowding</i>	0.6% (-1.7%, 2.9%)	11.4% (9.9%, 12.8%)	11.3% (9.6%, 13.1%)
$\Delta Exp CCP$	100.0%	100.0%	100.0%

component dominates all other components for the full sample, but volatility and crowding become much more important when considering only the top 100 and the top 10 exposure changes.

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Reply to associate editor

Dear Associate Editor:

We are grateful for all encouraging feedback. Given the momentum we decided to implement the changes you are asking as quickly as we could pushing many items aside in our agendas. We copy all your feedback below in italics, followed by our response in regular font. Again, thanks a lot for all and, in particular, for your clear guidance.

One of the referees has signed off, while the other one continues to have significant concerns. I have looked through the paper as well as the report, and I think there are three main issues to address:

1. *The issue of interactions that is raised by the referee both in this round and in the previous round. I agree with the referee that this is naturally raised in this paper rather than in a separate one.*

This item took most of our time. Thanks for pushing this point as indeed it could add further economic insights to our paper. Among ourselves we discussed the various ways that “interactions” could be analyzed. In the end, we framed it as an identification issue. Triggered by the referee’s feedback we decided to address this identification issue in the following ways:

- (a) We add a discussion of the identification of the various components at the end of Section 3.1. We emphasize that there are two issues that should not get confused. The first one is the sequencing in OFAT that matters for the size of components. The second issue is one of “statistical” identification in the sense that if two components are, say, perfectly correlated in the time series, it is hard to attribute an effect to either one or the other.
- (b) We report our findings on both of these issues in Section 5.1. The sequencing issue is more of a robustness analysis so we decided to add its results as an appendix. The time series co-variation yields economic insights which is why we added these results and their discussion to the main text. Although we cannot make causal statements, the (new) analysis of correlations between

components in the time series as well as their CoVaRs suggest that indeed there are strong coupling effects consistent with fire-sale dynamics. The CoVaR analysis, for example, shows that it is the conditioning event of steep price drops (crashes) that has strongest coupling effects in the sense that it coincides with, for example, steep increases in volatility, return correlations, and crowding.

- 2. The issue that the referee raises about the adding-up constraint "In my previous report I asked: "The result which shows that for the full sample, position risk from house to house trades, house to client trades and client to client trades, account for 45.9%, 44.6% and 10.8% respectively, should be checked because it gives the sum of 101.3% of CCP exposure changes (page 26)." The explanation provided is that this is due to an individual component that is negative. However, the authors in the revised paper still do not explain which component is negative and why." I agree that this is a concern, and more generally, in this round, we should be moving towards a highly polished version of the paper in which we sort out all such remaining issues.*

We misunderstood the referee on this point in the previous round. Our apologies. Instead of a footnote clarifying why components can become negative we now discuss the negative components explicitly in the main text. A single paragraph turned into three paragraphs in Section 5.1. On p. 25 we now state:

Third, the price and correlation components remain small in the two subsamples and sometimes turn negative. Note that the components can be either positive or negative as they can either increase or reduce CCP exposure; and when scaled by the total positive exposure change ($\Delta ExpCCP$), the negative components lead to negative percentages. Importantly, the relative contribution of the various components add up to 100%.

Interestingly, the price component contributes -4.5% in the top 10 $\Delta ExpCCP$. We speculate

that this result must be driven by price crash events that are typically accompanied by high volume and volatility spikes. A lower price level *per se* reduces CCP exposure, simply because CCP exposure is denominated in euro. Suppose the 1% VaR is to lose 20 cents on one euro. *ceteris paribus*, the 1% VaR would be to lose 10 cents on 50 euro cents (i.e., with price-level halved). The “exposure” dropped from 20 cents to 10 cents in this example due to a lower price level.

One, however, should not conclude that price crashes lower exposure. This goes back to our discussion of the identification of components. Price crashes might be *coupled* with volatility and positions in the sense that *conditioning* on extreme price drops, tail events for volatility or position changes become more likely. We further scrutinize the identification of the components at the end of this section with the help of CoVaR (Tobias and Brunnermeier 2016).

3. *Differentiation from Menkveld (2017). The referee raises a question about this, which I think is a reasonable one, but I believe this is not a big issue, and the authors will need to identify areas of focus and differentiation and make these clear in the response and the text.*

Understood. We clarified the contribution of this paper relative to Menkveld (2017) in the following ways. First, we believe that the intraday focus of our study is a contribution over Menkveld (2017) but also relative to other papers in the field. This was already stated in the previous version. What we believe the referee is uncomfortable with is the potential methodological contribution as Menkveld (2017) also contains decompositions that, as a matter of fact, we also use. We do believe, however, that there is a methodological contribution and we clarified it by adding the following text to the introduction:

The methodological contribution relative to Menkveld (2017) is that we decompose his

exposure measure to diagnose the nature of exposure changes. Although [Menkveld \(2017\)](#) discusses how to decompose across clearing members, he does not decompose exposure *changes* into changes in the various variables that enter the exposure computation (e.g., changes in volatility, changes in return correlations, or changes in positions). Such decomposition is needed to test the first hypothesis.

We further clarified one subtle but potentially confusing point that changes in security-return correlations do not affect the crowding component in our paper, but they do affect the crowding indicator as defined in [Menkveld \(2017\)](#). The reason for this difference is that we define the crowding component more narrowly as pertaining to positions in *securities* whereas it is more broadly defined in [Menkveld \(2017\)](#) as positions in *risk factors*. We use the narrower definition here to distinguish between a change in security-return correlations and a change due to crowding in terms of security positions. Footnote 13 has been added to clarify this issue.

If these three issues are sorted out, I think the path to convergence is clear; I expect this will occur on the next round.

Thanks again for helping us significantly improve the paper and thus position it for maximum impact.

Reply to referee 1

We are grateful for your feedback — for recognizing our improvements as well as for your suggestions on how to further improve the paper. The editor emphasized three of your points in particular:

1. Correlation across components needs to be analyzed.
2. Negative components in the decomposition deserve discussion.
3. The contribution over Menkveld (2017) needs to be clarified.

We focused mostly on these points, but also addressed your other concerns to the best of our ability. We hope we have parsed your feedback correctly. Thanks again for helping us improve our manuscript.

Detailed response to your points

The paper has been changed a lot starting from the title and the re-focusing of the paper on testing various hypothesis. The topic is still timely and interesting. However, I had a number of concerns about the previous version of the paper, and I believe that the authors only partially addressed them in the new version. Moreover, new concerns are now raised in the new version of the paper. Relative to the previous version, there are:

a) several significant improvements:

- *The title has been changed stressing that the paper is now focusing on CCP exposures and not on systemic risk*
- *The focus of the paper is now on testing three hypotheses rather than on proposing a real time risk-dashboard for CCP*
- *The authors have considered all possible sequences of the factors and show that the results are robust*

- *The assumption of normality of returns has been addressed using the volume clock*
- *There is now a better description of the data used in the empirical application*
- *The decomposition in terms of levels allows to emphasize the role of concentration of risk in few members and few risk factors*
- *The Greek financial crisis has been investigated in more details and the difference between exposure level and exposure change has been highlighted.*

Thanks for recognizing these changes as improvements. We agree that these greatly helped the paper.

b) several aspects that have not been addressed:

- *The interaction among factors are very important. The authors claim that the wedge between the lower and upper bound of a component's contribution is driven by the interdependence of the various components and looking to upper and lower bound takes care of this aspect. However, as the authors stressed, correlation between changes in RetVol and changes in TrCrowding are highly correlated and this aspect has not been investigated deeply. My request of highlighting this aspect derives from the fact that it is the interaction between price changes and similarities on changes in positions that might generate the negative externalities that characterized fire sales (the base motivation of your hypothesis). It seems to me that this aspect has been ignored. TrCrowding captures changes in the correlations of member's portfolio returns, and if my understanding is correct, is merging the effect of portfolio correlation due to stock returns correlations and correlation due to similarities in holding and trading and therefore it is impossible to distinguish between the role played by price changes and position changes.*

Thanks for revisiting and emphasizing this issue as it is not only important in and of itself, but also closely related to the motivation of our hypotheses. Fire sales manifest themselves simultaneously in several components. This critique has led to the following changes to the

manuscript:

- (a) We have added substantial analysis of the interaction of the various components. Thanks again for pushing this point as indeed it adds further economic insights to our paper. Among ourselves we discussed the various ways that “interactions” could be analyzed. In the end, we framed the issue as one of identification. Triggered by your feedback we decided to address this identification issue in the following way:
- i. We add a discussion of the identification of the various components at the end of Section 3.1. We clarify that there are two issues that should not get confused. The first one is the sequencing in OFAT that matters for the size of components. The second issue is one of “statistical” identification in the sense that if two components are, say, perfectly correlated in the time series then it is hard to contribute an effect to either one or the other.
 - ii. We report on our findings on both of these issues in Section 5.1. The sequencing issue is more of a robustness analysis so we decided to add its results as an appendix. The time series co-variation yields economic insights which is why we added these results and their discussion to the main text. Although we cannot make causal statements, the (new) analysis of correlations of components in the time series as well as their CoVaRs suggest that indeed there are strong coupling effects consistent with fire-sale dynamics. The CoVaR analysis, for example, shows that it is the conditioning event of steep price drops (crashes) that has strongest coupling effects in the sense that it coincides with, for example, steep increases in volatility, return correlations, and crowding.
- (b) And, more specifically to your point “and if my understanding is correct, is merging the effect of portfolio correlation due to stock returns correlations and correlation due to similarities in holding and trading and therefore it is impossible to distinguish between the role

played by price changes and position changes,” your understanding is indeed incorrect and we are to blame. When discussing the crowding component in the previous version we wrote:

TrCrowding: The additional impact due to changes in the correlations of member’s portfolio returns. If such correlations increase (in magnitude) then CCP exposure increases.

We, however, realized that this description is sloppy and incorrect. It should have emphasized that it pertains only to increased portfolio-return correlations *due to position changes*.

We have rephrased the description as follows to avoid confusion :

TrCrowding: The additional impact due to changes in the correlations of member portfolio returns, beyond what is caused by changes in the correlation of security returns (as that change is captured by *RetCorr*). *TrCrowding* is therefore solely the result of position changes due to trading. If these portfolio correlations increase (in magnitude) then CCP exposure increases.

We also add footnote 13 to clarify how crowding is defined more narrowly than in [Menkveld \(2017\)](#):

Note that this is a narrower definition of crowding than the one that underlies the *CrowdIx* indicator in [Menkveld \(2017\)](#). An increase in the correlations of security returns would lead to a higher level of *CrowdIx* because crowding in [Menkveld \(2017\)](#) is more broadly defined in terms of risk factors. We use the narrower definition here to distinguish between a change in security-return correlations and crowding due to position changes.

- *In my previous report I asked: "The influence of one variable may be much bigger when another variable is set at a certain level, which can lead to certain interactions (i.e. coupling effects,*

opposite movements etc.). This is another aspect not investigated." This aspect has not been investigated and it has been indicated to be "considered in a follow-up paper". However, given that it has been highlighted that the differences in the results are clearly dependent on levels and changes, it is surprising that this aspect has not been investigated more deeply.

Thanks for pushing this point forcefully. We have followed your lead and added a CoVaR analysis to identify “coupling effects.” Such coupling effects indeed seem to be in the data and, we believe, are consistent with the fire-sale channel. We added the analysis to the paper (see also our reply to your previous point).

- *In my previous report I asked: "There is not attempt by the authors to discuss how general are their results. It could be that the assumption of normality of asset returns is acceptable for stock markets, but what about derivatives markets like options, CDS, repo, etc. This is a relevant aspect given that the large attention on CCP arises from the Dodd-Frank and EMIR regulations on mandatory central clearing for standard derivatives." The authors addressed this issue by referring to the market-microstructure invariance results (Kyle and Obizhaeva, 2016). However, the market microstructure of CDS or IRS contracts is completely different than the one of the equity market. The majority of the transactions (even if now cleared) are still performed in the OTC market. There is no presence of HFT, there is not a CLOB where the price could be moved without trading, etc. Therefore, it is not clear to me how the authors could claim that their findings "might" carry over for CDS or IRS.*

We understand that the market structure of these assets is very different. We back-tracked from siding with Kyle and Obizhaeva who believe that market structure is irrelevant and updated footnote 6 from

Although we cannot claim that any of our findings carry over to credit default swap or interest rate swap for lack of evidence, the market-microstructure invariance principle

suggests that they might (Kyle and Obizhaeva 2016). This invariance principle states that trading in all securities is similar in a fundamental sense but might differ in terms of speed.

to

We do not know how our findings compare to CCP exposures in the market for credit default swaps or for interest rate swaps for lack of evidence. We, however, believe that our approach could be implemented for trading in these markets in spite of their different market structure (which features mostly over-the-counter trading as opposed to trading via a central limit order book).

- *Margin and collaterals. In my previous report I asked: "The authors argue that an increase of the exposure by only one clearing member (for instance, a big investment bank or a big dealer) can trigger some alert in the dashboard, but in reality this alert could not pose any problem in terms of solvency of the counterparty. Therefore, the authors should investigate what could be the potential value of the parameters that leads to a potential insolvency of the CCP given the margins and the collateral posted. A scenario analysis can be useful to set some early-warning values for the dashboard." The authors reply to this point is that, given that the overall message of the reviewing team was to add more economics to the paper and leave the somewhat narrow risk-dashboard focus. The measure used stops short of accounting for collateral and default-fund contributions. This aspect has been stressed also in footnote 5 of the paper. In particular, footnote 5 argues that margins and default funds are not the scope of the analysis. But as the whole paper is motivated by looking at the behavior of CCPs in the tails, I think that margins and default funds are highly important for the paper. What can we say about CCPs if we ignore what CCPs do? How can we evaluate exposures if we do not compare them with the instruments used to hedge these exposures? Moreover, it seems that these exposures, even in the tails, are*

not economically so relevant (5 million). The question is then: what type of exposures would be relevant to trigger a significant problem for a CCP (I am not even mentioning the potential presence of a systemic event)? This is why a scenario simulation might help to provide an idea at which stage these dynamic exposures should be troublesome for a CCP.

We agree that “margins and default funds are highly important” and that the analysis of *net* exposure (i.e., net of margins and the default fund) would be the first best. We, however, do not have data on intraday margin or the size of the default fund. Such data is not publicly available and the CCP is unable to make such data available for us, partially because of confidentiality of this information but also because they simply do not keep history of intraday margins in particular. We clarify this issue in footnote 5 by updating it from

One could argue that the tails are not riskier to a CCP because higher exposures against clearing members are insured by the latter posting higher margins with the CCP. While this is true, it is also true that if there are losses that exceed the margin, they exceed by a larger amount in the tail (i.e., loss given default is likely to be larger). A deeper analysis of risk *net* of margin and other forms of collateralization (e.g., the default fund) are beyond the scope of this study.

to

One could argue that the tails are not riskier to a CCP because higher exposures against clearing members are insured by the latter posting higher margins with the CCP. While this is true, it is also true that if there are losses that exceed the margin, they exceed by a larger amount in the tail (i.e., loss given default is likely to be larger). A deeper analysis of risk *net* of margin and other forms of collateralization (e.g., the default fund) are beyond the scope of this study as intraday margin and default-fund data are unavailable to us.

- In my previous report I asked: "The result which shows that for the full sample, position risk from house to house trades, house to client trades and client to client trades, account for 45.9%, 44.6% and 10.8% respectively, should be checked because it gives the sum of 101.3% of CCP exposure changes (page 26)." The explanation provided is that this is due to an individual component that is negative. However, the authors in the revised paper still do not explain which component is negative and why.

We misunderstood your point in the previous round. Our apologies. Instead of a footnote clarifying why components can become negative we now discuss the negative components explicitly in the main text. A single paragraph turned into three paragraphs in Section 5.1. We now state:

Third, the price and correlation components remain small in the two subsamples and sometimes turn negative. Note that the components can be either positive or negative as they can either increase or reduce CCP exposure; and when scaled by the total positive exposure change ($\Delta Exp CCP$), the negative components lead to negative percentages. Importantly, the relative contribution of the various components add up to 100%.

Interestingly, the price component contributes -4.5% in the top 10 $\Delta Exp CCP$. We speculate that this result must be driven by price crash events that are typically accompanied by high volume and volatility spikes. A lower price level *per se* reduces CCP exposure, simply because CCP exposure is denominated in euro. Suppose the 1% VaR is to lose 20 cents on one euro. *ceteris paribus*, the 1% VaR would be to lose 10 cents on 50 euro cents (i.e., with price-level halved). The "exposure" dropped from 20 cents to 10 cents in this example due to a lower price level.

One, however, should not conclude that price crashes lower exposure. This goes back to our discussion of the identification of components. Price crashes might be *coupled* with volatility and positions in the sense that *conditioning* on extreme price drops, tail

events for volatility or position changes become more likely. We further scrutinize the identification of the components at the end of this section with the help of CoVaR (Tobias and Brunnermeier 2016).

c) *several new issues:*

- *What exactly is the economic question? The questions on page 2 are purely of descriptive nature. There is a clear link missed between the fire-sales issue (largely driven by some amplification effect due to negative externalities generated by individual behavior) and these hypotheses.*

We list the three (economic) questions in the introduction, with the discussion of fire-sale dynamics preceding it. We agree that the link is not as clear as it could be. We therefore added the following concluding sentence in the paragraph that describes fire sales (p. 2):

Such fire-sale channel implies that extreme exposures coincide with elevated crowding, price crashes, and volatility spikes.

This should help to clarify the connection. A direct test of fire-sale dynamics is certainly very interesting. However, we believe that we cannot do so given the data that is available to us. To do so convincingly one would need to observe the financial stress levels of the various traders and show that once these are beyond a certain threshold, these traders start to unwind their positions, leading to price crashes that potentially push others into financial distress (i.e., the externalities you refer to). Given that we do not observe stress levels such test is unfortunately out of reach for us.

- *What is the contribution of this paper to the literature? That the exposure on the tails is largely driven by the crowding component? We know this already from the paper of Menkveld (2017). What do we learn from this paper that we do not know already from Menkveld (2017)? The paper looks like jumping to different literatures, from crowding, systemic risk, clearing efficiency, risk*

management, to CCP exposure. The authors say: We contribute to this literature by proposing an approach to monitor CCP exposure intradaily along with economically meaningful decompositions. What do you mean by economically meaningful decompositions, the results should be stated upfront?

Menkveld (2017) shows that crowding is elevated on days of high CCP exposure. The analysis there was done on a daily frequency. Partially motivated by the desire of regulators world-wide (CPMI-IOSCO 2017), our study zooms into *intraday* exposure changes, and rather than showing that there is a time-series correlation between *CrowdIx* and *ExpCCP*, it *decomposes* $\Delta ExpCCP$ into changes of the various variables that jointly enter the calculation of *ExpCCP*. We added footnote 8 to make this point explicitly:

More precisely, Menkveld (2017) shows that there is a positive time-series correlation between crowding and CCP exposure at a daily level. This paper, however, studies exposures *intradaily* and *decomposes* changes into all variables that enter the calculation of *ExpCCP*.

On p. 5 we now clarify what we mean by “economically meaningful” decompositions avoiding the term itself (as we agree: Why be vague when one can be precise?):

The methodological contribution relative to Menkveld (2017) is that we decompose his exposure measure to diagnose the nature of exposure changes. Although Menkveld (2017) discusses how to decompose across clearing members, he does not decompose exposure *changes* into changes in the various variables that enter the exposure computation (e.g., changes in volatility, changes in return correlations, or changes in positions). Such decomposition is needed to test the first hypothesis.

- *How different are the results of the decomposition to the different risk factors with respect to a sensitivity risk factor analysis as the one proposed by Menkveld (2017) tools #3: i.e. compute*

how sensitive ExpCCP is to one more unit of risk added to one of the 5 risk factors considered.

The results are likely to be similar. We considered doing such analysis when writing the initial version of the paper but early feedback from colleagues and CCPs pushed us towards a decomposition. This is why we landed on the OFAT decomposition. Such decomposition along with, following your advice, a robustness analysis with respect to sequencing and a time-series analysis of co-variation of the various components (correlation and CoVaR) yields rich insights into CCP exposure in the tail.

- *Regarding crowding risk, I have a naive issue: let's assume that all the clearing members decide to change their portfolio so that to hold the "CAPM market portfolio", crowding risk would be very large then, does this mean that CCP exposure is larger?*

Yes! You are exactly right. They all hold, one could say, a single risk-factor in that case. This, by the way, is related to the message we try to convey when discussing the results in Table 7. On p. 32 we state:

The unchanged concentration for the decomposition across stocks does not preclude crowding in a particular *portfolio* of stocks. To study whether this is the case, we apply principal component analysis (PCA) on member portfolio returns for the full sample and for both subsamples. Table 7 shows that there does appear to be elevated crowding in the subsamples. It is strongest for the first principal component (PC1) whose share in total variance increases from 7.8% in the full sample to 20.8% for the top 10% sample and to 37.6% for the top 1% sample. As the largest CCP exposures occur mostly in the Greek crisis period, it is likely that this component captures a market effect. To verify, we compute the correlation of PC1 with the local market index and indeed find the pattern we expect: it is 0.43 for the full sample, 0.86 for the top 10% subsample, and 0.98 for the top 1% subsample.

- *How a CCP could use the information provided by this decomposition is also ignored. Menkveld (2017) proposed three different tools to help manage crowding risk. Can these tools also be used to help managing the ExpCCP risk?*

In the spirit of the three tools proposed by [Menkveld \(2017\)](#), the new tool we propose is the decomposition of CCP exposure changes. We highlight the usefulness of such tool by updating the relevant sentence in the conclusion from

The decompositions allow for immediate diagnostic analysis.

to

The proposed decomposition of exposure changes helps CCPs and regulators diagnose sudden large jumps in exposure.

- *Finally, given that the focus of the paper is on hypothesis inspired by economic theories, what are the policy implications?*

We believe that our paper should be of interest to policy makers who are asking for intraday exposure monitoring tools as emphasized in the introduction ([CPMI-IOSCO 2017](#)). We propose such tool (exposure monitoring along with decompositions) and illustrate how it can be used based on real-world CCP data. We conclude by emphasizing that this approach should help CCPs and regulators monitor CCP exposure changes and decompose them to see what variables seem to drive changes in CCP exposure. Finally, regulators seem interested as this version of the paper will be endorsed by the BIS as it will be published as a BIS working paper (we have just received agreement by the editorial committee of the BIS Working Paper series). We have checked with the editor of Management Science if this is agreeable to them and he agrees (as it helps overall visibility of the paper).

Thanks again for all your comments and suggestions — they helped us greatly.