OESTERREICHISCHE NATIONALBANK EUROSYSTEM

Liquidity stress testing

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Session 1

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Main challenges of liquidity stress tests



Data

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Liquidity risk assessment



Diversity of liquidity risk measurement

- Projected cash flows
- Stock approach balance sheet maturity mismatch (O/N 6M)
- Balance sheet based ratios
 - Customer deposits/total loans ratio
 - Rate sensitivity and stability of customer deposits
 - Diversification
 - (Market funds liquid assets)/total assets
 - Liquid assets/total assets
 - Composition and diversification of liquid assets
 - Expected liquidity under distress
 - Current liability ratio (current liabilities/short-term liabilities or total liabilities)
 - Working capital/total assets
 - Liquidity coverage ratio (liquid assets/average daily negative cash flow)

Data requirements

Contractual / behavioural maturities	Gross / net cash flows	Liquidity coverage approach / separation of liquidity risk exposure & risk bearing capacity	Stock of liquid assets / counterbalancing capacity
Single currency / multiple currencies	Frequency, cut-off date and reporting time lag	Product oriented/accounting balance sheet based versus functional items	Reporting period and bucket size (9 buckets)
	Consolidated / solo	Differentiation according to business model / comprehensive template	

Template design crucial

Contractual & behavioural	 Without contractual → results biased Behavioural assumptions explicit → reveal risk tolerance Allow for institution specifity
Gross cash flows	 Allow for differentiated analysis of liquidity risk exposure → more risk sensitive More granular stress tests possible
Counterbalancing capacity	 Consistency across inflows/outflows counterbalancing capacity Makes implicit assumtions of stock explicit -> information gain
Multiple currencies	 Liquidity risk currency specific Links across currencies product specific
Functional items	 Common language among li-risk managers & supervisors Facilitates scenario design & calibration

Net cash flows and stock of liquid assets

	Investment Bank						
				Time to run f	till the term		
	ENTRIES						
		1	2	3	4	5	6
1	Net Cash-Flows						
1.1	Net Wholesale Flows	-279	-367	-448	-530	-220	-341
1.2	Net Retail Flows	-21	-55	-44	-10	-14	-19
1.3	Net Securities issued (long-term)	127.5	173.6	227.5	187.5	122.8	210.5
1.4	Net Securities issued (short-term)	234.45	281.4	359.7	252.45	183.75	284.7
1.5	Net Loans to Non-financials	-2.4	-3.74	-3.34	-4.16	-3.8	-3.52
1.6	Net Repos	28	51	1	20	-61	2
1.7							
1.8							
1.9	Net Own investments	-118	-150	-67	-146	-130	-155
2	Net Funding Gap	-30.45	-69.74	25.86	-230.21	-122.25	-21.32
3	Cumulated Net Funding Gap	-30.45	-100.19	-74.33	-304.54	-426.79	-448.11
	Liquid Assets						
4.1	Central banks reserves (level 1)	350					
4.2	Central banks reserves (level 2)	50					
4.3	Other liquid assets	50					
4.4							
5	Sum of liquid assets	450					

Net cash flows and stock of liquid assets

	Growing Retail Bank						
				Time to run t	ill the term		
	ENTRIES						
		1	2	3	4	5	6
1	Net Cash-Flows						
1.1	Net Wholesale Flows	0	0	0	0	0	0
1.2	Net Retail Flows	124.7	184.6	235.9	258.9	163.8	238.5
1.3	Net Securities issued (long-term)	127.5	173.6	227.5	187.5	122.8	210.5
1.4	Net Securities issued (short-term)	0	0	0	0	0	0
1.5	Net Loans to Non-financials	-280	-413	-433	-682	-410	-474
1.6	Net Repos	0	0	0	0	0	0
1.7							
1.8							
1.9	Net Own investments	0	0	0	0	0	0
2	Net Funding Gap	-27.8	-54.8	30.4	-235.6	-123.4	-25
3	Cumulated Net Funding Gap	-27.8	-82.6	-52.2	-287.8	-411.2	-436.2
	Liquid Assets						
4.1	Central banks reserves (level 1)	350					
4.2	Central banks reserves (level 2)	50					
4.3	Other liquid assets	50					
4.4							
5	Sum of liquid assets	450					

Gross cash flows and stock of liquid assets

	Investment Bank									
	·		Time to run till the term							
	ENTRIES									
1	Cash-Inflows	1	2	3	4	5	6			
1.1	Wholesale inflows	1284	3798	3227	2668	1956	2746			
1.2	Retail inflows	247	846	359	589	638	385			
1.3	Securities issued (long-term)	1275	1736	2275	1875	1228	2105			
1.4	Securities issued (short-term)	1563	1876	2398	1683	1225	1898			
	Maturing loans to Non-financials	120	187	107	200	190	176			
1.4.1	New repo inflow	124	187	124	118	120	132			
1.4.2	Maturing reverse repos	50	37	49	27	34	41			
1.4.3										
1.4.4	Own investments maturing	125	176	89	200	146	150			
	Sum of Cash-Inflows	4788	8843	8688	7368	5537	7633			
2	Cash-Outflows									
2.1	Wholesale outflows	1563	4165	3675	3198	2176	3087			
2.1.1	Retail outflows	268	901	403	599	652	404			
2.1.2	Securities due (long-term)	1147.5	1562.4	2047.5	1687.5	1105.2	1894.5			
2.2	Securities due (short-term)	1328.55	1594.6	2038.3	1430.55	1041.25	1613.3			
2.2.1	Maturing repos	120	136	148	100	180	147			
2.2.2	New reverse repos	26	37	24	25	35	24			
2.2.3	New loans granted	122.4	190.74	170.34	212.16	193.8	179.52			
2.3	Own investments	243	326	156	346	276	305			
2.8	Sum of Cash-Outflows	4818.45	8912.74	8662.14	7598.21	5659.25	7654.32			
	Net Funding Gap	-30.45	-69.74	25.86	-230.21	-122.25	24.32			
	Cumulated Net Funding Gap	-30.45	-100.19	-74.33	-304.54	-426.79	-448.11			
3	Liquid Assets									
	Central banks reserves (level 1)	350								
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3.1.3	Other liquid assets	50								
3.1.4										
3.2	Stock of liquid assets	450					3			

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Gross cash flows and stock of liquid assets

	Growing Retail Bank									
	·		Time to run till the term							
	ENTRIES									
	Cook Informa	1	2	3	4	5	6			
<u> </u>	Cash-Innows									
1.1	Wholesale inflows									
1.2	Retail inflows	1247	1846	2359	2589	1638	2385			
1.3	Securities issued (long-term)	1275	1736	2275	1875	1228	2105			
1.4	Securities issued (short-term)									
	Maturing loans to Non-financials	1120	1887	2267	2508	1690	2276			
1.4.1	New repoinflow									
1.4.2	Maturing reverse repos									
1.4.3										
1.4.4	Own investments maturing									
	Sum of Cash-Inflows	3642	5469	6901	6972	4556	6766			
2	Cash-Outflows									
2.1	Wholesale outflows									
2.1.1	Retail outflows	1122.3	1661.4	2123.1	2330.1	1474.2	2146.5			
2.1.2	Securities due (long-term)	1147.5	1562.4	2047.5	1687.5	1105.2	1894.5			
2.2	Securities due (short-term)									
2.2.1	Maturing repos									
2.2.2	New reverse repos									
2.2.3	New loans granted	1400	2300	2700	3190	2100	2750			
2.3	Own investments									
2.8	Sum of Cash-Outflows	3669.8	5523.8	6870.6	7207.6	4679.4	6791			
	Net Funding Gap	-27.8	-54.8	30.4	-235.6	-123.4	-25			
	Cumulated Net Funding Gap	-27.8	-82.6	-52.2	-287.8	-411.2	-436.2			
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3.1.4										
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Gross cash flows and counterbalancing capacity

	Investment Bank								
	1		Time to run till the term						
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		1	2	3	4	5	6		
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	Cumulated Net Funding Gap	-30.45	-100.19	-74.33	-304.54	-426.79	-448.11		
3	Counterbalancing Capacity								
	Central banks reserves (level 1)	350							
3.1	Central banks reserves (level 2)	50							
3.1.3	Other liquid assets	50	-25.9	20.7	-96.8	14	1.75		
3.1.4									
3.2	Sum of Counterbalancing Capacity	450	-25.9	20.7	-96.8	14	5		
5 nc	Cumulated Counterbalancing Capacity	419.55	323.91	370.47	43.46	-64.79	-84.36		

Gross cash flows and counterbalancing capacity

			Time to run till the term					
	ENTRIES							
		1	2	3	4	5	6	
1	Cash-Inflows							
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	Sum of Cash-Inflows	3642	5469	6901	6972	4556	676	
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2.2.1	Maturing repos							
2.2.2	New reverse repos							
2.2.3	New loans granted	1400	2300	2700	3190	2100	275	
2.3	Own investments							
2.8	Sum of Cash-Outflows	3669.8	5523.8	6870.6	7207.6	4679.4	679	
	Net Funding Gap	-27.8	-54.8	30.4	-235.6	-123.4	-2	
	Cumulated Net Funding Gap	-27.8	-82.6	-52.2	-287.8	-411.2	-436	
3	Counterbalancing Capacity							
	Central banks reserves (level 1)	350						
3.1	Central banks reserves (level 2)	50						
3.1.3	Other liquid assets	50						
3.1.4								
3.2	Sum of Counterbalancing Capacity	450	0	0	0	0		

Example I: EBA LRA 2011

Cash-Outflows
Own issuances due
Unsecured wholesale funding due
thereof: from non-financial corporates
thereof: from financial corporates
thereof: from financial institutions
thereof: from government/public entities
thereof: from institutional networks
Secured wholesale funding due
thereof: secured by sovereign debt 0% r/w
thereof: secured by sovereign debt 20% r/w, covered bonds up to AA-, non-financial corporates)
thereof: secured by equity
thereof: secured by other instruments
Repos due with central banks
Retail (incl. SME) funding due
thereof: sight deposits
New loans granted
Outflows from derivatives
Undrawn volume of committed credit/liquidity lines to financial institutions and SPV.
Undrawn volume of committed liquidity lines to financial corporates.
Undrawn volume of committed credit/liquidity lines to retail/sme/non-financial corporates and credit lines to financial
corporates
Additional outflows due to a two-notch rating downgrade
Others
Sum of Cash-Outflows

Example (cont'd)

Cash-Inflows	
New own issuances (already contracted)	
Unsecured wholesale funding	
Secured wholesale funding	
Retail funding	
Loans maturing	
thereof: loans to financial institutions	
thereof: other	
Inflows from derivatives	
Paper in own portfolio maturing	
Reverse repos	
thereof: secured by sovereign debt 0% r/w	
thereof: secured by sovereign debt 20% r/w, covered bonds up to AA-, non-financial corporates	
thereof: secured by equity	
thereof: secured by other instruments	
Volume of available credit lines from financial institutions	
Others	
Sum of Cash-Inflows	
Net Funding Gap	
Cumulated Net Funding Gap	

Example (cont'd)

•				• •
Count	erha	lancin	a cana	CITV
ocum	CI NU		g oupe	U

Cash and central bank reserves in excess of minimum reserve requirements

Unencumbered CB eligible collateral (deposited at central banks)

Claims on sovereigns (PSEs or government guaranteed) 0% risk-weight under Basel II standardised approach

Claims on sovereigns (PSEs or government guaranteed) 20% risk-weight under Basel II standardised approach

Covered bonds (excl own issues, rating at least AA-)

Non-financial corporate bonds (rating at least AA-)

Other CB eligible assets (incl credit claims)

thereof: own issues

Unencumbered assets (CB eligible, but not deposited at CB)

Claims on sovereigns (PSEs or government guaranteed) 0% risk-weight under Basel II standardised approach

Claims on sovereigns (PSEs or government guaranteed) 20% risk-weight under Basel II standardised approach

Covered bonds (excl. own issues, rating at least AA-)

Non-financial corporate bonds (rating at least AA-)

Other CB eligible assets (incl. credit claims)

thereof: own issues

Other non CB eligible, tradeable assets (incl equity)

Sum of Counterbalancing Capacity (after haircut)

Cumulated Counterbalancing Capacity (after haircut)

Example II: Austrian maturity mismatch template

🖌 six currencies*)

Inflows (14 line items)

- Maturing instruments (loans, swaps, ...)
- Fixed / expected issuances (short- and long-term)
- Expected deposit inflows (un/secured, retail / wholesale)

Outflows (16)

- New loans, advances, calling of lines, ...
- Tender, Repos, Issuances (due)
- Expected deposit outflows (un/secured, retail / wholesale)

Counterbalancing Capacity (9)

- Cash, excess reserves at the central bank (by rating category)
- Tender / unencumbered collateral
- Liquid and other assets available for collateralisation

five maturity buckets**)

*) Six currencies include: EUR, USD, CHF, GBP, YEN and a basket of other currencies.

**) Five maturity buckets cover: up to 5 days, 1 month, 3 months, 6 months and 12 months.

Session 2

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Scenario design

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Scenario design

Issues to consider

- Internal consistency
- Idiosyncratic and market scenarios
- Time horizon(s)
- Cross-border flow of liquidity and collateral
- Behavioural (second round) effects
- Shortening/lengthening of funding terms
- Linkages between liquidity, credit and market risk

Risk factors – components of liquidity stress tests I

Risk factors - cash inflows	Risk factors - cash inflows
	Expected net run-off of wholesale deposits of which:
Loans due from credit institutions of which:	from banks (unsecured interbank deposits)
unsecured interbank loans	from banks (secured interbank deposits - repos)
receivables due from repos	from sophisticated wholesale investors (i.e. non-bank financial intermediaries)
Expected loans due from non-banks of which:	from less sophisticated wholesale investors (i.e. non-financial firms)
from households	Expected net run-off of retail deposits of which:
from non-financial companies	demand deposits (volume covered by deposit insurance)
from non-hinalicial companies (i.e. bdge funde, private	demand deposits (volume not covered by deposit insurance)
equity companies)	term deposits (volume covered by deposit insurance)
	term deposits (volume not covered by deposit insurance)
Expected repayments on bonds in portfolio (coupon and/or	Credit lines called of which:
principal) of which:	called by households (overdraft)
	called by non-financial institutions
from (local) governments, agencies etc.	called by banks
nom (local) governments, agencies etc.	called by non-bank financial intermediaries
from non-financial companies	Own issues due (net of potential new issuances) of which:
from banks	Long-term debt (senior benchmark issues)
from non-bank financial companies (i.e. hedge funds, private	Long-term debt (covered bonds)
equity companies)	Short-term debt (CP)
	Net cash outflows from derivatives of which:
Others of which:	outflows due to margin calls
	others
unrevocable credit line provided by other banks	Others
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Risk factors – components of liquidity stress tests II

Risk factors - counterbalancing capacity	Risk factors - other risk factors
Tightening of the class of assets accepted as collateral by relevant	Exchange rate movements vis-a-vis currencies in which the banks faces material liquidity risk]
central banks (i.e. changes to ESCB single list back from AAA-BBI	3 FX appreciations
to AAA-A)	FX depreciations
Downgrade of assets in counterbalancing capacity of which:	Barriers to the cross-border flow of liquidity of which:
	ring-fencing of liquidity by regulators
AAA rated	operational shock to cross-border payment or settlement system
	FX-swap market dry-up
AA rated	Funding costs
Aratad	Money market rates spreads (increases in bp)
Alaleu	1MEuribor-1MEurepo
BBB rated	3MEuribor-1MEurepo
Increase in haircut of assets held in counterbalancing capacity of	6MEuribor-1MEurepo
which:	CP rate spreads (increase in bp)
AAA rated [increase of average haircut: in %-	3MCP rate-treasury (or local equivalent) 1M
points]	6MCP rate - treasury (or local equivalent) 6M
AA rated [increase of average haircut: in %-	12MCP rate treasury (or local equivalent) 12M
points]	Bond market spreads (increases in bp)
	senior benchmark-swap
A rated [increase of average haircut: in %-points]	securitisation-swap
BBB rated [increase of average haircut: in %-	Retail deposit spreads (increases in bp)
points]	demand deposit-Q/N
Others [[increase of average baircut: in % paints]	term deposit 1 year-treasury (or local equivalent) 1 year
Others [[increase of average nation. In 70-points]	term deposit 3 years-treasury (or local equivalent) 3 years
Equidty holdings [increase of average haircut: in %-points]	term deposit 5 years-treasury (or local equivalent) 5 years

Scenario calibration

Fundamentals

□ Never use banks' internal evidence for calibration

- Few banks have experienced liquidity shocks
- Do not focus on bank characteristics alone
 - □ Market dynamics can affect also very sound banks
- □ Evidence based calibration is most convincing
 - □ Extensive literature surveys very helpful (I.e. BCBS 24/25)
- □ Parameter uncertainty is intrinsic
 - Do not over-engineer calibration
- □ Coherent economic story key to communication

Scenario calibration

Consistency with solvency scenario

• Often contain relevant parameters (e.g. bond prices)

Econometric approach not feasible

- Low frequency/high impact events
- Data hardly available

Product & market specific

Reporting data & academic literature

Case studies

Bank, market & country level

Output of solvency stress test

• See discussion below

Elements of scenario calibration



Types of scenario

What types of stress test scenario do you consider: adverse market conditions (1), idiosyncratic shocks (2), combinations of (1) and (2), other scenarios?



Scope



Deposits (Liabilities I)

Insured deposits

- Mixed evidence regarding price & quantity effects
- Example: Northern Rock → setup of DGS matters (full coverage £2,000; 90% coinsurance up to an additional £33,000 → runpremium= £3,300 net)
- Focus on expected inflows rather than withdrawals

Uninsured deposits

- Clear evidence of price/quantity effects
- Transaction/operational deposits
- Domestic/non-domenstic and/or FX deposits
- Volume/pricing/distribution channel deposits

ABCP & CP (Liabilities II)

High stress sensitivity	Very quick evaporation of liquidity under stress & substantial spread increases
	Substantial liquidity risk for sponsors \rightarrow Warehousing & commitments
Distinction across issuers takes time	Intitially run on the market then selective reopening for higher quality issuers
Strong influence of stability of non-banks	Non-bank financials can have substantial impact on market liquidity & pricing
	Liquidity risk of MMMF (Primary Reserve Fund)

Issuences (Liabilities III)

Unsecured issuances

- Long-term/short-term → Longterm issuances more information sensitive
- Impact on maturity → spirals of increasing liquidity risk
- Private placement/public issuance →public issuance more information sensitive

Secured issuances

- Underlying assets → lowerasset quality/transparency more information sensitive
- Covered bonds versus ABS →
 ABS more information sensitive
- Domestic currency versus FX →
 FX more information sensitive
- Private placement/public issuance →public issuance more information sensitive

Repo (Liabilities IV)

□ In principle, more stable than unsecured, but strong cyclicality due to

- 1. Collateral valuation,
- 2. Haircuts,
- 3. Breadth & depth of the market,
- 4. Rehypothecation chains,
- 5. Changes in counterparty limits,
- 6. Tenors/maturities
- 7. Demand shocks (migration from unsecured to secured),
- 8. Supply shocks (banks precautionary self-insurance; non-banks flight to safety & from maturity)

Secured funding (cont'd)

- Stress tests haircuts/roll-over assumoptions must combine different impacts of the above + bank characteristics/counterparty/collateral/market structure, e.g.
 - $\Box \quad \text{More risky/less liquid collateral} \rightarrow \text{higher haircuts}$
 - Repo markets in some collateral can even disappear (subprime/leveraged/opaque ABS)
 - $\Box \quad \text{Others experience collateral shortage} \rightarrow \text{flight to safety}$
 - Tri-party repo more stable than bilateral, but riskier/less liquid collateral still subject to shocks
- Collateral swaps (combination of two repos)
 - Margining impact on outflows
 - □ Non-roll-over impact on CBC

Haircuts in US Tri-party repos for selected collateral classes



Data source: FRBNY, January 10, 2014

Type (90th percentile haircut)

- Treasuries (3.0%)
- Agency MBS (3.0%)
- Agencies (3.0%)
- Money market (5.0%)
- Agency CMO (7.2%)
- IG Corporate (8.0%)
- Equities (15.0%)
- HY Corporate (15.6%)
- CMO (Private) (19.8%)

Other
Haircuts in bilateral repos for selected collateral classes I

	June	2007	June 2009				
	Counterparty			Counterparty			
	Prime ¹	Non-prime ²	Unrated ³	Prime ¹	Non-prime ²	Unrated ³	
G7 governme	nt bonds			•			
Short-term	0	0	0.5	0.5	1	2	
Medium- term	0	0	0.5	1	2	3	
US agencies							
Short-term	1	2	3	1	2	3	
Medium- term	1	2	3	2	5	7	
Pfandbrief	0	0	1	1	2	8	

Haircuts in bilateral repos for selected collateral classes I

Prime MBS						
AAA-rated	4	6	10	10	20	30-100
AA- and A- rated	8	12	25	100	100	100
Asset- backed securities	10	20	20	25	50	100
Structured products (AAA)	10	15	20	100	100	100
Investment gi	rade bonds					
AAA- and AA-rated	1	2	5	8	12	15
A- and BBB-rated	4	7	10	10	15	20
High-yield bonds	8	12	20	15	20	40
Equity						
G7 countries	10	12	20	15	20	25
Emerging economies	15	20	35	20	25	40

Liquidity/credit facilities (Liabilities VI)



Counterbalancing capacity I

- Only assets that are expected to be liquid on private markets under stress should be eligible for the counterbalancing capacity
- □ Market liquidity can decrease very quickly for many asset classes
 - Measuring market liquidity non-trivial
 - $\Box \quad \text{Lower credit quality} \rightarrow \text{less stable market liquidity}$
 - \Box Lower market liquidity \rightarrow higher decreases during stress
 - Consistency of haircuts in repo and counterbalancing capacity
- Diversification
- □ Control of liquidity management function
- □ Actual usability \rightarrow regular test sales/repos
- Encumbrance

Counterbalancing capacity II

Central bank eligibility

- Might have a positive feedback effect on the market liquidity of tradable eligible assets
- But monetary policy implementation/regimes (currency boards) need to be taken into account
- No over-reliance on central bank eligibility

Minimum reserve requirements

- Usually dedicated to monetary policy objectives
- Source of liquidity iff explicitly designed for that purpose
- Averaging period no sufficient condition for inclusion in CBC
- Subordinate other creditors of the bank (i.e. the deposit insurance scheme)?

Unsecured interbank market (Counterparties I)

- Complete dry-up/loss of access standard assumption even under mild liquidity stress
- Driven by counterparty risk/precautionary self-insurance
- Reinforced by second round effects positive feedback-loops & network effects
- □ Volume decreases trongly for longer tenors
- □ Overnight sometimes more stable
 - But combined effect of shorter tenors & loss of market access
 - \Box Increasing wall of maturity in short tenors \rightarrow negative dynamics
- Loss of market access rather than higher rates

Counterparties II

MMMF

- Regulation matters (CNAV?) for MMMF investor behaviour
- MMMF investor base matters → institutional investors more information sensitive
- Shorten maturity, reduce credit risk & tenor
- Run on European banks (2011H1)

Depositor relationship

- Duration: Long-term customers are less information sensitive
- Breadth: Additional products deepen relation & legal framework (netting?)
- Depth: Operational dependence
 → impact of withdrawal on client operations?

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Systemic liquidity

Systemic liquidity

Definition	Integrated view of liquidity across markets, instruments, and counterparties.						
	Interaction of market & funding liquidity risk						
	Interaction with credit & counterparty risk						
Complex dynamics during times of systemic liquidity stress	Correlations between the components of systemic liquidity bifurcates						
	Some instruments become safe havens, while others experience strongly reduced market liquidity.						
Systemic liquidity can evaporate	High systemic liquidity is high \rightarrow banks might reduce self-insurance (i.e. they are more willing to lend and supply-side tenors are longer) and rely more heavily on future availability of liquidity.						
quickly	Positive feedback-loops and network externalities \rightarrow exacerbate shocks!						

Systemic liquidity & liquidity stress tests

- ❑ Non-bank financial intermediaries play an increasingly important role in systemic liquidity → impact on inflows & outflows & CBC
- Network models: indirect contagion via systemic liquidity more important than via networks of bilateral exposure
- □ Implications for scenarios design
 - □ Integration of solvency and liquidity stress tests & feedback-effects and network effects
 - Intrinsic interaction of banks' capital, leverage, and liquidity dynamics & money and capital market dynamics
 - □ Interaction between banks & non-bank financials can be very important
 - ❑ Shocks can origniate from outside the banking sector → soundness/capital not sufficient insurance against liquidity shocks
 - Combination of runs by wholesale creditors, fire sales of assets, and risks of a general credit crunch

Implications for macroprudential supervision



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Parameter uncertainty

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Embedded scenarios

- Scenario 1
 - Closure of unsecured interbank markets
 - Closure of FX Swap markets
- Scenario 2
 - Reduced issuance of short term / long term debt
 - Increase in calling of credit committments
 - Mild haircuts on unencumbered collateral in CBC
- Scenario 3
 - Dry up of funding markets no future debt issuance
 - Severe increase in calling of credit committments
 - Increased Haircuts on CBC according to the asset quality
 - Reduction in planned financial investments (mitigating)
- Scenario 4
 - Combines scenario 3 with idiosyncratic shock
 - Reduction of expected roll-over rates of wholesale and retail deposits

Reveals liquidity risk tolerance

Treatment of CBs as lender of last resort

Destinction between LoLR & monetary policy implementation



Lender of last resort

- Discretionary/extra-ordinary deviation from the standard framework of monetary policy implementation
- Liquidity provided to individual/subsample of institutions on specific terms that are not available to other market participants

Monetary policy implementation

- Reaction to expected increase of the structural liquidity deficit at the target rate
- Always market oriented never individual bank focused
- Can entail deviatons from standard monetary policy

LoLR: focus on markets rather than failing bank

Arguments for reliance on LoLR

- Historical experience
- Theory
 - Potential efficiency gains under restrictive assumption (e.g. prevent asset fire sale contagion)

Arguments against reliance on LoLR

- Conflicts with raison-d'être for liquidity regulation
 - Internalise externality & moral hazard & efficient allocation of liquidity & risk
 - Qualitative liquidity regulation aims at self-insurance (CEBS 2009, 2010a, BCBS 2010)
- FX liquidity (e.g. Bulgaria)
- LoLR cannot be considered in isolation (subordination, bank resolution)
- Political economy of bail-outs
 - Interference in property rights, fiscal exposure, distributional effects
- CB discretion undermined
 - Delienation of illiquidity from insolvency impossible under time pressure
 - •Conflict of interest with monetary policy implementation

Potential efficiency gains can be achieved by less distortionary alternatives

Less distortionary alternatives to standard LoLR

Pricing	Charging a fee according to the liquidity risk exposure and liquidity risk bearing capacity of the bank	Objective: Internalise the externality associated with liquidity risk \rightarrow banks should be indifferent between effective self-insurance and insurance by the public			
		Challenge: unrealistic → fair price difficult to estimate (see pricing of RCLF in AUS)			
Conditionality	Automatic sanctions	Replacement of board members			
		Trigger for early intervention mechanism			
Liquidity provision to market rather	Address asset fire sale externality	assumes other market participants cannot exploit underpricing due to liquidity constraints			
than illiquid bank	Original concept of the LoLR according to Thornton and Bagehot	Enables other market participants to profit from underpricing Limits negative price effect			

Conclusions: No LoLR in liquidity stress testing

Ensure sufficient liquidity risk bearing capacity

 HQLA must be composed of assets that are (extremely) highly liquid → no asset fire sale externality

CB operations should be treated like other repos

- Except for standard monetary policy implementation
- Consistency between the individual building blocks of liquidity stress tests

Liquidity stress testing must ensure self-insurance

- No room for LoLR in liquidity stress testing
- Only standard monetary policy operations

Scenario & parameter uncertainty

Scenario severity increases (for inflows, outflows, counter balancing capacity)

СВС Туре	Baseline	Market Mild	Market Medium	Market Severe	Combined
Full CBC					
Increased focus on market liquidity					
Market liquidity					

90 day Scenario

30 day Scenario

СВС Туре	Baseline	Market Mild	Market Medium	Market Severe	Combined
Full CBC					
Increased focus on market liquidity					
Market liquidity					

1 Year Scenario

СВС Туре	Baseline	Market Mild	Market Medium	Market Severe	Combined
Full CBC					
Increased focus on market liquidity					
Market liquidity					55

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Session 3

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Example

Structure

- Mild & severe scenario
- Market & combined scenario (idiosyncratic & market)
- 3 & 6 months horizons
- 3 different approaches to assess counterbalancing capacity
 - Full counterbalancing capacity (with haircuts)
 - CBC without non-liquid assets not deposited at central banks
 - CBC reduced to liquid assets according to LCR

•24 scenarios (all currencies) + 4 scenarios (USD)

Calibration I

Cash-Outflows	Mild Market	Mild Combined	Severe Market	Severe Combined
Own issuances due	1	1	1	1
Unsecured wholesale funding due				
thereof: from non-financial corporates	0	0,06	0,10	0,20
thereof: from financial corporates	0,15	0,25	0,20	0,40
thereof: from financial institutions	1	1	1	1
thereof: from government/public entities	0	0,05	0,00	0,05
thereof: from institutional networks	0	0,06	0,05	0,10
Secured wholesale funding due				
thereof: secured by sovereign debt 0% r/w	0	0	0,20	0,20
thereof: secured by sovereign debt 20% r/w, covered bonds up to AA-, non-				
financial corporates)	0,05	0,05	0,60	0,60
thereof: secured by equity	0,30	0,30	0,80	1
thereof: secured by other instruments	0,50	0,50	0,80	1
Repos due with central banks	1	1	1	1
Retail (incl. SME) funding due	0	0,06	0,05	0,10
thereof: sight deposits	0	0,06	0,05	0,10
New loans granted	1	1	1	1
Outflows from derivatives	1	1	1	1
Undrawn volume of committed credit/liquidity lines to financial institutions				
and SPV.	0,30	0,50	0,70	0,70
Undrawn volume of committed liquidity lines to financial corporates.	0,05	0,05	0,10	0,10
Undrawn volume of committed credit/liquidity lines to retail/sme/non-				
financial corporates and credit lines to financial corporates	0,05	0,05	0,10	0,10
Additional outflows due to a two-notch rating downgrade	0	0	0	1
Others	1	1	1	1
Sum of Cash-Outflows				

Calibration II

Cash-Inflows	Mild Market	Mild Combined	Severe Market	Severe Combined
New own issuances (already contracted)	1	1	1	1
Unsecured wholesale funding	0	0	0	0
Secured wholesale funding	0	0	0	0
Retail funding	0	0	0	0
Loans maturing	0	0	0	0
thereof: loans to financial institutions	1	1	1	1
thereof: other	0	0	0	0
Inflows from derivatives	1	1	1	1
Paper in own portfolio maturing	1	1	1	1
Reverse repos	0	0	0	
thereof: secured by sovereign debt 0% r/w	0	0	0,20	1
thereof: secured by sovereign debt 20% r/w, covered bonds up to AA-, non- financial corporates	0,05	0,05	0,60	1
thereof: secured by equity	0,30	0,30	0,80	1
thereof: secured by other instruments	0,50	0,50	0,80	1
Volume of available credit lines from financial institutions	0	0	0	0
Others	1	1	1	1
Sum of Cash-Inflows				
Net Funding Gap				
Cumulated Net Funding Gap				

Calibration III

Counterbalancing capacity	Mild Market	Mild Combined	Severe Market	Severe Combined
Cash and central bank reserves in excess of minimum reserve requirements				
Unencumbered CB eligible collateral (deposited at central banks)				
Claims on sovereigns (PSEs or government guaranteed) 0% risk-weight under Basel II standardised approach	0,03	0,03	0,05	0,05
Claims on sovereigns (PSEs or government guaranteed) 20% risk-weight under Basel II standardised approach	0,05	0,05	0,10	0,10
Covered bonds (excl own issues, rating at least AA-)	0,05	0,05	0,08	0,08
Non-financial corporate bonds (rating at least AA-)	0,05	0,05	0,10	0,10
Other CB eligible assets (incl credit claims)	0,08	0,08	0,10	0,10
thereof: own issues	0,08	0,08	0,10	0,10
Unencumbered assets (CB eligible, but not deposited at CB)				
Claims on sovereigns (PSEs or government guaranteed) 0% risk-weight under Basel II standardised approach	0,03	0,03	0,07	0,07
Claims on sovereigns (PSEs or government guaranteed) 20% risk-weight under Basel II standardised approach	0,05	0,05	0,15	0,15
Covered bonds (excl. own issues, rating at least AA-)	0,05	0,05	0,10	0,10
Non-financial corporate bonds (rating at least AA-)	0,05	0,05	0,15	0,15
Other CB eligible assets (incl. credit claims)	0,08	0,08	0,25	0,25
thereof: own issues	0,08	0,08	0,25	0,25
Other non CB eligible, tradeable assets (incl equity)	0,60	0,60	0,80	0,80
Sum of Counterbalancing Capacity (after haircut)				
Cumulated Counterbalancing Capacity (after haircut)				

Results (example) – liquidity risk tolerance

	Three months horizon Six months horizon			
	Mild	Severe	Mild	Severe
Market scenario	X ₁₁	X ₁₂	X ₁₃	X ₁₄
CBC without non-liquid assets not deposited at central banks	X ₂₁	X ₂₂	X ₂₃	X ₂₄
CBC reduced to liquid assets according to LCR	X ₃₁	X ₃₂	X ₃₃	X ₃₄
Combined scenario	X ₄₁	X ₄₂	X ₄₃	X ₄₄
CBC without non-liquid assets not deposited at central banks	X ₅₁	X ₅₂	X ₅₃	X ₅₄
CBC reduced to liquid assets according to LCR	X ₆₁	X ₆₂	X ₆₃	X ₆₄

 $X_{yz} = #$ of illiquid banks or US\$ of li-shortfall

Alternative: Concerted rounds of common liquidity stress tests

- Combine top-down and bottom-up approaches to macroprudential liquidity stress testing
- Incorporate data on measures taken
- Can incorporate second round effecets based on banks' reactions to liquidity stress

Disclosure policy of stress testing

Does your bank disclose the results of its liquidity stress tests to one of the following audiences?



The disclosure of liquidity stress test results is quite rare. What do you consider to be possible reasons for this from your bank's point of view? (multiple answers possible)



Standardisation of liquidity stress tests

How would you rank (from 1 most important to 5 least important) the benefits for your bank of standardisation of liquidity stress tests?



Would standardisation of the following liquidity stress test elements help to improve comparability among banks?



Other

Worthy as a leader (1) Use in risk rating of bank counterparty (3) Counterparty risk measurement (4) Market discipline (4) Comparability across banks (5) Given standardisation of liquidity stress tests, would disclosure requirements foster market discipline in liquidity risk management?





Measures taken

	amounts	in EUR mln										
	Baseline	scenario					Stress sc	enario				
	1 day	1 week	2 weeks	1 month	3 months	6 months	1 day	1 week	2 weeks	1 month	3 months	6 months
Dedicated portfolio disposal, adjustment trading limits o.w. bonds o.w. ABS o.w. equity other												
Adjustment of loans and deposits o.w. reduction unsecured interbank loans o.w. reduction repos o.w. reduction intra-group lines o.w. reduction of lending to corporates, households o.w. additional savings through increasing retail deposit rate												
Hedging measures o.w. interest rate contracts o.w. equity contracts o.w. CDS contracts Restructuring maturity profile												
Drawings on liquidity facilities o.w. unsecured interbank credit lines o.w. secured interbank credit lines, repos o.w. intra-group funding o.w. other*												
Debt issuance o.w. short-term debt instruments o.w. medium, long-term debt instruments o.w. ABS o.w. government-guaranteed debt**												
Recourse to central bank facilities												
Non-redemption of callable bonds												
Cutting dividends												
* stating counterparties ** Central bank policy and governmental support facilities are assum	ned to be left	unchanged, s	ave for chan	ges described	d in the scena	vrio						

Session 4

Practical session

Session 5

Interaction solvency/liquidity
Interlinkages solvency / liquidity

Solvency Stress Test	Mapping to Liquidity Stress Test
Deteriorating Capital Position	Ability to issue new CP & bonds (12M scenario)
Increase in Expected NPLs	Reduction in expected inflows from loan repayments Reduction of expected inflows from NFC bonds
Macro-driven PD Shifts	Implied rating migration of banks unencumbered collateral deposited at CB

Liquidity Stress Test	Mapping to Solvency Stress Test
Liquidity gap	Asset fire sales
Increase in Funding Costs	P&L effects

Timing / sequenzing of interaction





The interaction of solvency and liquidity



The interaction of solvency and liquidity







Asset fire sales losses [volume effect]

- Captures common exposure to market price & market liquidity effects
- Calibration: Based on HC of liquidity stress scenario & CC migration due to solvency
- Assets: Full CBC except callable, committed credit-lines, liquidity support received from holding company (binding commitment)
- Assumption: banks sell assets proportionally to composition of CBC
- Empirical evidence inconclusive

$$SFL_t \begin{cases} = 0, & if \ CNFG_t \le (cash + excess \ reserves) \\ = (CBCunstressed \ - CBCstressed) \times \left\{ \left[\frac{cash + excess \ reserves + CBC_{t,stressed}}{CBC_{t,un \ stressed}} \right] \right\}, & otherwise \end{cases}$$

- Effect: Banks with same level of CBC but higher shares of less liquid assets face higher asset fire sale losses
- Caveats: CB treatment; static, non-behavioural; no additional fire sale loss haircuts



Important channels disregarded

□ Impact of solvency on access to unsercured money market

- Pre-empt by assumption of complete dry-up
- Impact of own liquidity position on supply of funds on unsecured money market & network dynamics
 - Pre-empt by assumption of complete dry-up
- Contagious bank runs
- □ Margin calls due to rating downgrades
- Deposit outflows due to rating downgrades

Measuring the impact of interaction channels



- Losses on inflows from paper in own portfolio maturing (iii.)
- Market funding due to solvency position (iv.)
- Other liquidity impact not associated with solvency stress

Other risk costs through P&L

Credit risk costs

Conclusions, policy recommendations & discussion

Policy implications (I)

Liquidity stress tests complement liquidity regulation

Aggregation of comprehensive & complex information

Data quality key prerequisite

- Behavioural cash flows necessary
- Dynamic consistency across all components (in-/outflows & CBC)

Parameter uncertainty

- Careful & well documented empirical foundations
- Embedded scenarios of increasing severity
- Decision makers have to understand that even the best models and calibrations cannot exonerate them from the burden of subjective judgement in risk assessment

Policy implications (II)

No reliance on LoLR

• Moral hazard, externalities & pricing of liquidity risk

Interaction of liquidity/solvency must not be disregarded in stress tests

- Unterestimation of impact in LST 85%
- Under-estimation of impact on SST 50%

Parameter uncertainty

- Careful & well documented empirical foundations
- Embedded scenarios of increasing severity

No reliance on LoLR

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