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ENVIRONMENTAL TAXATION

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ABSTRACT

This paper examines potential environmental tax policy reforms. It focuses primarily on a carbon tax, but also more briefly considers a range of other possible changes. These include revising or eliminating various energy and environmental tax credits and deductions (many of which might become unnecessary in the presence of a carbon tax), as well as changes to energy taxes that have substantial environmental implications (such as the federal gasoline tax). The paper draws on recent theoretical and empirical research to evaluate the effects of such reforms on tax revenue, pollution emissions, economic efficiency, and income distribution.

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1. Introduction

Long-term projections of the US federal budget show an increasingly large deficit, which would be difficult to address using spending cuts alone. But tax reform proposals tend to be much more concrete about tax cuts than about how those cuts will be paid for (much less how to achieve a net increase in tax revenues). Thus, potential new sources of tax revenue are in demand.

There is also increasing recognition of the need to take action to limit emissions of greenhouse gases and further reduce emissions of local air pollutants. Using traditional command-and-control environmental regulation to accomplish those goals would be costly.

Environmental taxes have the potential to address both of those issues, providing a source of new tax revenue and a cost-effective way to reduce pollution emissions.

This paper examines potential environmental tax policy reforms. It focuses primarily on a carbon tax, which is the largest and most important potential new environmental tax. It also more briefly considers a range of other potential reforms. These include revising or eliminating various energy and environmental tax credits and deductions (many of which might become unnecessary in the presence of a carbon tax), as well as changes to energy taxes that have substantial environmental implications (such as the federal gasoline tax). The paper draws on recent theoretical and empirical research to evaluate the effects of such reforms on tax revenue, pollution emissions, economic efficiency, and income distribution.

The next section of this paper provides some background on the theory and practice of environmental taxation. Section 3 discusses carbon taxes. Section 4 considers changes to taxes on motor fuels (gasoline and diesel fuel). Section 5 briefly looks at reforms to existing

environment- and energy-related tax credits and deductions. The final section summarizes and concludes.

2. Background

This section provides first an overview of the theory of environmental taxation and then a short discussion of the existing environmental tax provisions in the United States.

A. Theory of Environmental Taxation

This subsection discusses the theory of environmental taxation and its implications for the design and implementation of environmental taxes. It starts by considering environmental taxes as corrective taxes, providing incentives to lower pollution emissions. It then goes on to consider the role of environmental taxes within the larger tax system, considering both the potential for using environmental tax revenue to lower other taxes (or prevent raising them) and how environmental taxes interact with the rest of the tax system. Finally, it compares environmental taxes with alternative policy instruments.

i. Corrective Taxation

The concept of using taxation to correct negative externalities, such as pollution, is generally credited to Pigou (1920), and such corrective taxes are sometimes referred to as Pigouvian taxation. The basic idea is simple. A negative externality – a case in which production or consumption of some good harms someone other than the buyer or seller of that good – represents a market failure because the buyer's and seller's decisions fail to take into account that external cost. Consequently, an unregulated free market will generally result in an inefficiently high quantity of any good with an associated negative externality. Imposing a tax on the externality-generating good can correct the externality. If the tax rate is set equal to marginal external damage (the total harm to parties other than the buyer and seller from one

additional unit of the good), it brings that external cost into the transaction, ensuring that the buyer pays the full marginal social cost of the good. Thus, the incentive provided by the tax ensures that the market produces the efficient level of the good (in the absence of any other uncorrected market failures).

One complication would be if the marginal external damage from a good varies based on who produces the good or how it is produced. For example, the carbon dioxide (CO₂) emissions from a megawatt-hour of electricity produced from a power plant that burns natural gas are much lower than the CO₂ emissions if the same quantity of electricity is produced by burning coal (and much lower still if produced by a wind turbine). But that apparent complication is easily incorporated into this simple theory, either by viewing those as different goods (and thus charging different tax rates on electricity produced from different sources) or, more simply, by viewing CO₂ emissions as the good with the negative externality, and imposing a tax per ton of CO₂ emissions. Similarly, if the marginal damage from local air pollutants varies based on where those pollutants are emitted,¹ then emissions in different locations should face different tax rates.

In practice, imposing a theoretically ideal tax can be challenging. Estimating marginal damage is difficult, particularly in cases where the harm will occur in the future (as with greenhouse gas emissions) or where damage varies widely across space or time (as with local air pollutants). And in many cases, it is difficult for taxing authorities to directly measure emissions, and thus imposing the tax on some proxy for emissions (such as the amount of fuel burned) makes it much easier to enforce. In such cases, any tax will need to depart from the

¹ For example, the marginal damage from emissions immediately upwind of a major city tend to be much higher than those in a sparsely populated rural area, because the number of people affected is much greater.

theoretical ideal, but the theory provides some general principles: set tax rates based on the best estimate of marginal damage, and when it is impractical to tax emissions directly, choose a proxy that is as close as practicable to what matters for marginal damage. Taxing based on those principles will most efficiently correct the negative externality from pollution.

Note that I have not yet mentioned the use of revenue from an environmental tax. Many non-economists would define an environmental tax as a tax whose revenue is used to address environmental goals. But to most economists, an environmental tax is a tax on pollution emissions (or on a good proxy for pollution emissions). This latter definition focuses on the corrective role of environmental taxes. In general, the revenue raised by efficient levels of taxes on emissions could be greater or less than the efficient level of spending to address environmental goals, and thus economic theory argues that environmental tax revenue should not necessarily be spent on environmental ends, nor should environmental spending necessarily be financed by environmental taxes.

ii. Environmental Taxes as Part of the Broader Tax System

Of course, environmental taxes don't just correct externalities. They also raise revenue, and that can be a major advantage. That revenue can be used to cut (or prevent increasing) other taxes, to reduce the budget deficit, to pay for public goods, to address distributional goals, or for many other purposes. At the same time, interactions between environmental taxes and other preexisting taxes (primarily income and payroll taxes) can significantly raise the efficiency costs of environmental taxes (or any other excise tax or similar policy). This sub-section reviews research on the potential gains from using environmental tax revenue, as well as the potential extra costs implied by interactions with other taxes. The argument that the revenue-raising role of environmental taxes is a substantial additional reason to implement such taxes first came to prominence in the "double dividend" literature.² The idea is simple: if revenue from an environmental tax can be used to finance a cut in the tax rate for a pre-existing distortionary tax (such as the income tax), that cut produces an efficiency gain in addition to the other effects of the environmental tax. The term "double dividend" refers to the claim that environmental taxes raise economic efficiency through two separate channels, both by correcting an externality and by raising revenue that can be used to cut other taxes. That second "dividend" has since come to be known as the "revenue-recycling effect."³ And that basic concept also applies to a broader range of uses for the revenue: spending the revenue on public goods or using it to cut the budget deficit could produce similar gains in economic efficiency.⁴

Early papers in the double dividend literature argued that because of that gain from recycling revenue, environmental taxes would still be worthwhile even if the pollutant being taxed turned out to be harmless: that the efficiency gain from revenue-recycling would more than cover the efficiency cost of the tax. That was a particularly attractive argument in the case of a carbon tax, because at the time the early double-dividend papers were written, there was still significant scientific uncertainty about the relationship between anthropogenic carbon emissions and climate change (and it remains a potentially attractive political argument even today, given

² See, for example, Tullock (1967), Pearce (1991), Repetto (1992), and Oates (1995).

³ The terms "revenue-recycling effect" and "tax-interaction effect" are due to Goulder (1995).

⁴ If the levels of the budget deficit and of spending on public goods are efficient ex ante, then at the margin, using environmental tax revenue to cut the deficit or increase public good provision will have the same efficiency benefit as using it to cut other taxes. To the extent that those levels are not optimal, those alternative uses could produce larger or smaller gains.

that many Americans still doubt that relationship). However, subsequent work showed that argument – now referred to as the "strong double dividend" – does not generally hold.

What those early double-dividend studies missed was the general-equilibrium interactions between environmental taxes and pre-existing distortionary taxes. Environmental taxes lower the real returns to factors of production such as capital and labor, either directly by reducing wages and returns on capital, or indirectly by pushing up the prices of polluting goods. This discourages the supply of those factors, and because pre-existing taxes have already distorted those factor markets (causing the marginal social cost of supplying those factors to be lower than their marginal product), this creates a welfare loss.

Under central-case assumptions, the extra cost from this "tax-interaction effect" is actually slightly larger than the gain from the revenue-recycling effect, and thus not only is there no strong double dividend, but the efficient level of an environmental tax is slightly lower than marginal pollution damage. The intuition for that result is that broader taxes are generally more efficient revenue-raising instruments, and an environmental tax is a narrower tax than an income tax (because the income tax covers all production, whereas the environmental tax covers only polluting production).

More recent work has pushed back to some extent against that conclusion. To pick just one example, Parry and Bento (2000) suggest that inefficient tax preferences within the income tax system (tax deductions, credits, and exemptions that are not justified by market failures) narrow the tax base of the income tax, and that taking this into account means that environmental taxes are more efficient at raising revenue than the income tax – and thus that the optimal environmental tax is more than marginal damage. A major problem with that argument is that it compares the existing (inefficiently designed) income tax to an efficiently designed

environmental tax. If a real-world environmental tax also includes inefficient deductions or exemptions, then this would weaken or overturn Parry and Bento's argument.

The literature has not come to a single clear and unambiguous conclusion about whether interactions with the broader tax system cause the optimal environmental tax to be slightly higher or lower than marginal damage: it depends on many aspects of the situation at hand. But the literature has generally rejected arguments that such effects cause the optimal tax to be dramatically different from marginal damage.

iii. Environmental Taxes versus Other Environmental Policy Instruments

There are many other alternative policies beyond taxes that can be used to reduce pollution emissions, including tradable permits, technology or emissions standards, and subsidies for less polluting alternatives. In general, the most efficient policies provide an incentive to reduce emissions, while giving the market flexibility about how to accomplish that emissions reduction – flexibility both across different methods of reducing emissions for a given emitter and across different emitters.

Emissions pricing policies – emissions taxes or tradable permits – provide that combination of incentives with flexibility. Other policies generally do not. For example, a technology standard (such as a requirement that all new automobiles have a catalytic converter) requires the use of emissions control technology but provides little or no incentive to reduce emissions in any other way (such as by improving fuel economy or driving less). Standards also typically aren't flexible across emitters (i.e., there's no option for one emitter to reduce pollution further than the standard requires in return for another emitter's being allowed to reduce pollution by less). Similarly, subsidizing a less polluting alternative (such as subsidies for

ethanol) provides an incentive only for switching to that alternative, not for any other way to reduce emissions.

The flexibility provided by emissions pricing policies provides a cost advantage because polluters can choose the lowest-cost combination of methods of reducing emissions. Policies that provide less flexibility will generally be more expensive (for a given level of emissions reductions) because they don't take advantage of all of the possible channels for reducing emissions.

There are some potential efficiency arguments for those less-flexible policies. One such argument is ease of monitoring and enforcement: if it is much easier to check whether a particular technology is in place (e.g., whether a car has a catalytic converter installed) than it is to monitor emissions levels, that could outweigh the cost advantage that would come with greater flexibility. A few decades ago, this was a major consideration in many cases. But given advances in monitoring technology, this argument has much less bite today. Another argument is that poorly informed emitters given flexibility may not choose the lowest-cost option, and if regulators are better informed, then a regulation that provides incentives only on the low-cost options could be more efficient than a fully flexible policy. But while this might hold in some cases, the claim that regulators know a business's or consumer's costs better than that business or consumer does should be regarded with some skepticism.

B. Environmental Taxes in the United States

Metcalf (2009) says that "Environmental taxes in the United States are like virtue: much discussed but little practiced." Williams (2009) notes that definitions of what constitutes an environmental tax vary, and measures of the magnitude of environmental taxation will vary

correspondingly.⁵ But under any reasonable definition, the current level of environmental taxation in the United States is very low, relative either to environmental taxation in other developed countries or to the levels that would efficiently correct major pollution externalities.

By far the largest existing environmental tax in the US is the motor fuels excise tax: state and federal taxes on motor fuels accounted for approximately \$70 billion in 2005, which was roughly 94% of all US environmental tax revenue (Metcalf, 2009). The remainder comes from a variety of much smaller taxes. Although some of these are intended to provide incentives (e.g., the "gas guzzler" tax on cars with especially low fuel efficiency), most are designed simply to raise money to remediate environmental problems (e.g., an excise tax on oil to fund the Oil Spill Liability Trust Fund, or the excise tax on coal which funds the Black Lung Disability Fund). Fullerton (1996) notes that this latter group provides only relatively weak incentives to reduce pollution, because the tax bases for these taxes are not tightly connected to pollution emissions.

Metcalf (2009) compared environmental tax revenue in the United States with that of other OECD countries, using data from the mid 2000s. Environmental tax revenue as a share of gross domestic product (GDP) was lower for the US than for all but one other country (Mexico), and was far less than the average (US environmental tax revenue was 0.9% of GDP, compared with 2.23% for the average OECD country). Looking at environmental tax revenue relative to total tax revenue yields a similar picture: the US had the lowest of all countries in the sample. Using more recent data would, if anything, strengthen that pattern: the US has not imposed any substantial new federal environmental taxes, and the tax rate for the biggest environmental tax in

⁵ Williams suggests three possible definitions for what constitutes an environmental tax: a tax whose revenue is spent on an environmental goal, as a tax intended to reduce pollution, or as a tax on pollution emissions (or on some quantity closely correlated with pollution emissions. The first two definitions would likely exclude motor fuel taxes, which account for the vast majority of "environmental tax" revenue in the US and in most other industrialized nations.

the US – the motor fuels excise tax – has remained constant in nominal terms per gallon since 1993, thus falling in real terms.

An alternative comparison would be to the level of environmental taxation that would efficiently correct major environmental externalities. Again, current levels of environmental taxation look very low. First consider motor fuel taxes. Rates for these taxes are well below the efficient level (i.e., marginal external damage). The current combined federal and average state tax is 48.69 cents/gallon,⁶ whereas Parry and Small (2005) find that the efficient tax rate would be roughly \$1/gallon.⁷

Including other possible environmental taxes widens this gap much more. Consider the carbon tax. Carbone et al. (2013) estimate that a \$30/ton carbon tax would raise an average of \$226 billion per year (in 2012 dollars) over the first 10 years after implementation. That's more than twice the total revenue per year from all existing state and federal environmental taxes. And that rate is somewhat lower than most recent estimates of marginal damage.⁸ Thus, even if one considers only those two environmental taxes – motor fuels taxes and a carbon tax – the revenue from setting the taxes at levels necessary to correct externalities would dwarf existing US environmental tax revenue.⁹

⁶ This figure comes from American Petroleum Institute (2015).

⁷ West and Williams (2007) find that interactions with the rest of the tax system (as discussed in Section 2.A.ii) imply an even higher efficiency-maximizing gas tax rate. For further discussion and a breakdown of the Parry and Small estimate, see section 4.A of this chapter.

⁸ For example, a recent Inter-Agency Working Group report (US IAWG, 2013) estimates that the marginal external damage per ton of carbon is roughly \$43.

⁹ One can't simply add together revenue from motor fuels taxes and a carbon tax, both set to the efficient level, because this would entail some double-counting: most estimates of the marginal damage associated with motor fuel use include carbon emissions from motor fuels. However, this double-counting is small: carbon emissions account for slightly less than 5% of Parry and Small's (2005) estimate of the efficient gasoline tax.

There are also a variety of environmental tax incentives that aren't environmental taxes, but rather tax expenditures: tax deductions, credits, or exemptions that provide incentives for "clean" (i.e., less polluting, at least on some dimension) energy or energy conservation. These are small in absolute terms (in fiscal year 2010, the largest was the alcohol fuel credit and excise tax exemption, which cost \$5.75 billion, and that provision has since expired), but nonetheless large relative to all existing US environmental taxes other than motor fuels taxes.

3. A Carbon Tax

Increasing concentrations of greenhouse gases in Earth's atmosphere are trapping heat, leading to an overall warming of the globe and other related changes to the climate. The most important of these gases is carbon dioxide, which is emitted primarily through burning fossil fuels, though other gases such as methane are also important. Reducing emissions of greenhouse gases is the most reliable way to limit or prevent such changes. A tax on such emissions – generally referred to as a carbon tax, even though it could apply to a broader range of gases than just carbon dioxide – would be a cost-effective means of reducing such emissions.

This section reviews research on the design of a carbon tax and on what effects such a tax would have. The first subsection reviews key design elements of such a tax. The next subsection looks at estimates of key aggregate effects of a carbon tax. The final subsection considers the incidence of a carbon tax: how the burden of the tax is distributed.

A. Carbon Tax Design

This subsection focuses on details of a carbon tax: what the tax base is, at what point in the production process the tax could be imposed, the tax rate, and the path for the rate. In each of these cases, economic theory gives a simple and clear answer for what will maximize efficiency, though real-world proposals often vary substantially from that.

i. Tax Base and Point of Collection

The primary role of a carbon tax is to correct an externality, with the goal of reducing emissions of greenhouse gases. Thus, the theoretically ideal tax base would be all greenhouse gas emissions, with each gas taxed based on how much effect one unit of emissions of that gas has on climate change. As the name "carbon tax" suggests, such a tax would apply to carbon dioxide emissions, but would also apply to a range of other greenhouse gases, such as methane, nitrous oxide, and chlorofluorocarbons. In practice, however, implementing such a tax presents practical difficulties.

First, reducing the climate-changing effects of a particular gas to a single number is not a simple exercise. Different gases trap heat to different extents and persist for different periods of time in the atmosphere. Methane, for example, is a much more potent greenhouse gas than carbon dioxide (one extra ton of methane in the atmosphere has approximately the same short-run greenhouse effect implications as a hundred tons of CO_2), but persists for a much shorter period (with an atmospheric lifetime of roughly 12 years, versus an estimated 30 to 95 years for CO_2), so the relative effects of the two gases depend crucially on the time period used for evaluation.¹⁰

The standard approach in the literature is to calculate the "global warming potential" (GWP) for a given gas: the sum of its climate-changing effect over a given period of time, taking into account the gradual decay of the gas in the atmosphere over time, but not taking into account discounting or changes over time in the marginal damage from a particular temperature change.¹¹

¹⁰ These numbers and the GWP estimates in the following paragraph are taken from Forster et al. (2007), table 2.14.

¹¹ A theoretically ideal measure for economic purposes would make these two adjustments (for discounting and changes over time in marginal damage from climate change), and would use an infinite time horizon. But such a calculation would requires choosing a discount rate and

The GWP for a particular gas is then expressed relative to that of CO_2 . For example, the GWP of methane is 72 over a 20-year time horizon, indicating that over the first 20 years after it is emitted, a ton of methane will cause the same total warming over that period as 72 tons of CO_2 . The analogous numbers for longer time horizons are 25 over 100 years and 7.6 over 500 years, which shows how dramatic an effect the time horizon can have on this measure. Emissions are then generally expressed in terms of CO_2 equivalent quantities (CO_{2e}), typically based on a 100-year time-horizon GWP estimate. Adopting this approach for a tax would imply taxing CO_{2e} emissions or, equivalently, taxing emissions of each gas based on its GWP.

A more important problem is that monitoring emissions of many of these gases is difficult. CO_2 is relatively straightforward in this regard because the vast majority of anthropogenic CO_2 emissions come from combustion of fossil fuels (e.g., 94% of US CO_2 emissions in 2013 were from combustion¹²), and the CO_2 emitted by combustion is simply proportional to the quantity of carbon in the fuel.¹³ Thus, a tax on fossil fuel combustion, based on the carbon in the fuel, is equivalent to a tax on combustion-related CO_2 emissions. Moreover, much of the non-combustion CO_2 emissions are from large industrial uses such as cement manufacture and use, which are also relatively easy to monitor. Thus, including nearly all CO_2 emissions is relatively easy.

estimating the time path of marginal damage. One can view the standard GWP approach as a rough approximation to that.

¹² The emissions figures here and in the next paragraph come from U.S. EPA (2015).

¹³ This is because all of the CO_2 produced by combustion is released into the atmosphere. Carbon capture and storage (CCS) technology could change this. CCS would capture CO_2 released by combustion and store it so it is not released into the atmosphere. But CCS will only become cost-effective if technology advances dramatically or if carbon tax rates are much higher than the range of current proposals.

Mansur (2012) provides an excellent discussion of important considerations in choosing the point in the supply chain to apply a corrective tax. Because combustion-related CO_2 emissions depend only on the carbon content of the fuel, these considerations argue for imposing the tax at natural choke points in the fossil fuel supply chain, where the number of entities subject to the tax would be relatively small, thus minimizing enforcement and compliance costs. For example, there are roughly 150 refineries in the United States, so taxing the carbon content of oil at the refinery level (and applying an equivalent tax to imports of refined petroleum products when they enter the country) would be vastly simpler than taxing consumer purchases of refined petroleum products. Metcalf and Weisbach (2009) suggest that if the tax is applied in this manner, taxing a few thousand fossil fuel firms could cover roughly 80% of US CO_{2e} emissions.

Adding some other greenhouse gases to the base of a carbon tax could also be easy. Chlorofluorocarbons are already regulated and taxed (because of their role in depleting the ozone layer), so they would be easy to include in a carbon tax, and extending that to cover the closely related hydrochlorofluorocarbons (which are much less damaging to the ozone layer but similar in terms of greenhouse gas effects) would also be straightforward.

However, including most other greenhouse gases (which made up roughly 18% of US CO_{2e} emissions in 2013) is substantially more difficult. Advances in remote sensing could help track methane and nitrous oxide emissions, but it is still likely that including these gases in the base for a carbon tax would need to rely on taxing readily observable proxies for emissions, rather than the emissions themselves – and to the extent that those aren't perfect proxies, this could entail potentially significant inefficiencies (which would need to be weighed against the

inefficiency of leaving those emissions out of the tax base¹⁴). Including these gases could also be politically difficult because agriculture is responsible for a substantial share of emissions of these gases and is politically powerful.

ii. Initial Tax Rate and Time Path of Rate

As discussed earlier, the basic theory of corrective taxes suggests that the optimal corrective tax rate should equal the marginal damage per unit of emissions. Interactions with the broader tax system may raise or lower this somewhat but don't dramatically alter that basic conclusion.

The main question, then, is what is the marginal damage from greenhouse gas emissions. This is a complex and difficult question to answer, both because the exact climate effects of a given level of greenhouse gases remain uncertain, and because changes to the climate have a wide range of effects, most occurring well into the future, and these are uncertain and difficult to value accurately. Thus, any estimate will necessarily be highly uncertain.

A recent US interagency working group report (US IAWG 2013) estimated the marginal damage from carbon emissions (also referred to as the social cost of carbon, or SCC) to be roughly \$43/ton. Because this report could not follow all potential channels for climate change damages, this is likely to be an underestimate, though it is obviously difficult to predict the degree of underestimation. And the report has generally been highly controversial. Nonetheless, this represents the best available estimate, and thus is a good general guideline for the efficient carbon tax rate, suggesting a rate of \$43/ton CO_{2e} .

¹⁴ For example, leaks from the natural gas extraction and distribution system are responsible for a substantial share of methane emissions. Natural gas has lower CO_2 emissions per unit of energy than other fossil fuels, so a carbon tax would likely cause a shift from other fossil fuels toward natural gas. If methane leaks are significant, and are not taxed, then it's possible that the shift toward natural gas could actually raise CO_{2e} emissions. But taxing leaks is difficult.

This SCC estimate includes damages to the entire world (which is quite unusual: costbenefit analysis by the US government typically considers only costs and benefits to the US). Thus, setting a worldwide tax rate equal to that SCC estimate would be efficient from a global perspective (i.e., including costs and benefits to the entire world). Setting the US tax rate is a more complex problem. If one considers only costs and benefits to the US, and if other countries don't adjust their policies in response to US policy, then the optimal tax would be equal just to the marginal damage to the US, which is in the vicinity of \$4/ton to \$5/ton, roughly 1/10 of the SCC estimate. However, if the US puts any weight on damage to the rest of the world, or if other countries will react to more stringent US climate policy by making their own policies more stringent, then the optimal tax would be higher than marginal damage to the US, perhaps as high as (or if the latter effect is strong enough, even higher than) marginal damage to the entire world.

Weitzman (2009) argues that risk aversion and uncertainty about climate-change damages together should imply a much more aggressive policy to limit climate change. The argument is that the probability distribution of damage from climate change is "fat-tailed" – put simply, that as we consider very unlikely, highly catastrophic outcomes, the probability of those outcomes falls as we consider more and more severe possible outcomes, but falls relatively slowly compared with most commonly used probability distributions. This means that those catastrophic outcomes – even though they are very unlikely – are still enormously important in determining the expected harms from climate change. And thus, including those potentially catastrophic outcomes implies a much higher SCC estimate (indeed, in its most extreme form, Weitzman's argument implies an infinitely high SCC). More intuitively, Weitzman's argument suggests that we should view climate change policy more as buying insurance against the worst possible outcomes than as trying to reduce damages in the relatively likely cases of moderate

damage. Including such effects in a numerical estimate is very difficult, and thus the IAWG did not incorporate them – another reason it might represent an underestimate.

A closely related question concerns the optimal time path for the tax rate. Should the tax start immediately at the SCC, or should it be gradually phased in? And once it is fully in place, how should it change over time?

Williams (2012) shows that the efficient carbon tax would not be pre-announced or gradually phased in but would start immediately at the SCC, even if households and firms face substantial capital adjustment costs in responding to the tax (e.g., the cost of retiring coal-fired electric plants before the end of their useful lives). Shimer (2013) finds an analogous result for labor adjustment costs such as layoffs in fossil-fuel industries.

The intuition for these results is simple: although those adjustments are costly and affect the optimal quantity path for emissions (with higher adjustment costs implying a slower drop in emissions), the adjustment costs are not market failures, and thus they don't influence the optimal corrective tax, which still equals marginal damage. Williams (2012) notes, however, that these adjustment costs can be important for the distribution of costs, and that although other approaches such as direct transfers would be more efficient, if such alternatives are not possible, a gradual phase-in could be useful for meeting distributional objectives.

In general, the efficient carbon tax will rise over time at the same rate as marginal damage. The IAWG estimates suggest that the SCC rises at roughly 1.5% - 2% per year (in real terms), which would imply a similar rate of increase for the efficient carbon tax rate. Moreover, Daniel et al. (2015) and Lontzek et al. (2015) each add uncertainty about climate change (including the risk of climate tipping points) to integrated assessment models, and find that this implies a substantially different time profile for the SCC (and therefore for the optimal carbon

tax), one that starts much higher and rises much more slowly than without any uncertainty. Indeed, Daniel et al. (2015) finds that this effect is so strong that the SCC actually falls over time.

Sinn (2008) observes that a rapidly rising carbon tax could actually accelerate greenhouse gas emissions. Consider the problem than an owner of fossil-fuel reserves faces when a rising carbon tax is imposed. If the tax is high enough, then it might make sense to leave the fuel in the ground forever. But if not, the sooner that fossil fuel is extracted and burned, the less tax will be charged on it – and if the tax is rising faster than the rate of interest, then even the present discounted value of the tax will be rising over time, thus providing an incentive to extract and burn the fuel sooner. This leads to a "green paradox": a carbon tax that starts lower and rises rapidly can cause more emissions in the short run than if there were no tax at all. However, as noted earlier, estimates of the SCC rise substantially more slowly than the rate of interest, so a tax rising with the SCC won't trigger the green paradox.¹⁵ Thus, the green paradox is a real worry only for taxes that rise much faster than the SCC.

Some carbon-tax proposals set the carbon tax based on estimates of the SCC,¹⁶ but most proposals include rates that rise more quickly than that. Many call for a tax that rises at 4% or 5% in real terms (e.g., Morris's (2013) proposal for the Hamilton Project suggests a 4% real rise), and it is not uncommon to see proposals that rise far faster than that (e.g., recent proposals

¹⁵ If the SCC were rising faster than the rate of interest, then the "green paradox" could be optimal. A rapidly rising SCC would indicate that future carbon emissions are expected to cause much more damage than emissions today, and in such a case, burning the fuel now rather than later would reduce the damage it causes. But estimates suggest that case is more of a theoretical curiosity than a real possibility.

¹⁶ A notable recent example is the American Opportunity Carbon Fee Act, proposed in 2015 by Senators Sheldon Whitehouse and Brian Schatz.

from the Carbon Tax Center start at \$10/ton and rise by \$10/ton each year, an extremely fast rate of increase). There are three main reasons for this.

First, many of these proposals start at rates below the SCC and thus must rise more quickly to catch up. It would be more efficient to start at a higher rate and rise more slowly, but if distributional or political considerations prevent that, then starting low and rising quickly may be the next best alternative.

Second, some proposals are aimed at emissions reduction pledges (e.g., an 80% reduction in US emissions by 2050) or at specific temperature-change limits (e.g., a 2° C rise in global temperatures), and these typically entail very modest short-term reductions and very aggressive longer-term reductions in emissions, which are consistent with a very rapidly rising carbon price. These targets are generally arbitrary and rarely based even in part on any analysis of costs and benefits. Thus, the tax paths necessary to follow these emissions trajectories are often far from efficient. Nonetheless, such targets may have substantial political value. And the carbon tax is still a cost-effective approach for following any arbitrary trajectory.

Third, proposals are sometimes based on the idea that the tax rate should rise at the real rate of interest – a common characteristic of proposals offered by economists. This is the tax path that minimizes present-discounted costs of hitting a given total quantity of emissions over time (and is also the price path – in the absence of uncertainty – that a system of bankable and tradable carbon permits would follow). This has some appeal on cost-effectiveness grounds. But looking only at total emissions over a long period (rather than year-by-year emissions) makes sense only if the present-discounted marginal damage from emissions is constant over time. Put differently, this approach minimizes the discounted costs of hitting a target expressed

in undiscounted tons, a combination that doesn't generally make sense. Again, this kind of target may have political value, but it's not efficient.

B. Effects on Greenhouse Gas Emissions, Tax Revenue, Growth, and Efficiency

This section looks at estimates for important aggregate effects of a carbon tax: how it affects greenhouse gas emissions, the potential tax revenue, and effects on economic growth.

i. Greenhouse Gas Emissions

The primary purpose of a carbon tax is to reduce emissions of greenhouse gases. Thus, a central question for carbon tax models to answer is the extent to which a given carbon tax will actually reduce emissions. Estimates vary somewhat for a given carbon tax across different models. And they obviously vary substantially based on the details of the carbon tax, with the tax rate being the most important and the time path also playing an important role, while other details, such as the use of revenue from the tax play less important roles. The degree of coverage of the tax (the fraction of total greenhouse gas emissions that are in the tax base) is also potentially important, though differences here come mostly from whether the tax misses major fossil-fuel uses rather than the extent to which it includes non-CO₂ gases.

Two key points to note when evaluating estimates of emissions reductions are the year (or years) under consideration, and the reference point used for measuring reductions. In general, a given tax rate will generate larger emissions reductions further into the future, because some responses to the tax take significant time, and thus the long-run elasticity of emissions with respect to the tax rate is much higher than the short-run elasticity. The point of reference for reductions also matters. National pledges to reduce emissions are typically expressed relative to emissions in some base year (e.g., under the UN Framework Convention on Climate Change the US pledged to reduce emissions in 2025 to 26%-28% below 2005 levels), and model estimates

are sometimes also expressed this way. More commonly, estimates from economic models are reported as reductions below "business-as-usual" (BAU) emissions, meaning the level that would have occurred in a given year in the absence of the policy.¹⁷ The latter measures the effect of the policy, whereas the former shows the actual level of emissions.

Hafstead and Kopp (2015) find that a \$45/ton carbon tax, starting in 2016 and rising at 2% per year in real terms, would reduce US emissions in 2025 by 41% relative to BAU, which is equivalent to 45% below 2005 levels. In contrast, Carbone et al. (2013) estimate that a \$50/ton carbon tax (starting in 2015 and held constant in real terms) would reduce US emissions in 2025 by roughly 23% below BAU. Part of that difference reflects differences in the tax rate under consideration, but more of the difference comes from differences in the models used. Estimating the responsiveness of large sectors of the economy to a carbon tax is very difficult, given that the US has never imposed such a policy, and thus estimates vary significantly across models.

By way of comparison, the latter study also finds that a \$30/ton tax would reduce emissions by roughly 17% below BAU, and a \$20/ton tax by roughly 12%. In general, the effect on emissions rises less than linearly with the tax rate (e.g., doubling the tax rate will less than double the emissions reductions). These estimates vary somewhat based on how the revenue from the tax is used, but those differences are relatively small: for example, the estimated emissions reduction from a \$30/ton carbon tax is 14.92% if the carbon tax revenue is recycled to finance tax cuts on capital income, versus 16.61% if it is returned to households via lump-sum transfers. That difference arises largely because of differences in overall economic growth caused by the different uses of revenue.

¹⁷ A further complication is that BAU sometimes refers to emissions in the absence of the particular policy under consideration, and sometimes to emissions in the absence of any GHG emissions reduction policies.

Most models suggest that the vast majority of emissions reductions will come from the electricity sector, at least for moderate carbon tax rates. For example, the same Hafstead and Kopp (2015) study find that 72% of the emissions reductions in 2025 come from the electricity sector. This is because switching from coal to lower-carbon sources of electricity is one of the least expensive ways to reduce carbon emissions.

An alternative approach when considering the emissions effect of a carbon tax is to look at the question from the other direction: what tax rate is necessary to achieve a particular level of emissions reductions in a given year (or a particular path of emissions over a range of years)? Fawcett et al. (2015) reports results from a Stanford Energy Modeling Forum exercise that took this approach, using eight models under a range of assumptions about technology changes and other influences. The exercise looked at what carbon tax rate would be needed to achieve a 17% reduction (relative to 2005) by 2020 and a 50% reduction by 2050. On average across the different models and assumptions, this required a tax rate of \$41/ton in 2020 and \$192/ton in 2050 (both expressed in 2012 dollars). This again shows the non-linearity of the response to the tax: getting a reduction roughly three times as large requires a tax rate more than three times as high. Those estimates also ranged widely across models, with a standard deviation of \$35/ton in 2020 and \$113/ton in 2050, which again demonstrates the degree of uncertainty about how large the response to any given tax would be.

ii. Carbon Tax Revenue

Given an estimate of the emissions effects of a carbon tax, estimating the gross revenue the tax will raise is simple: it equals the tax rate times the emissions subject to the tax. The revenue from a moderate carbon tax is potentially substantial. Carbone et al. (2013) estimates that a \$30/ton carbon tax (held constant in real terms) would raise a total of \$2.26 trillion in gross

revenue over the first ten years. Marron et al. (2015) scale a Congressional Budget Office estimate and find that a \$25/ton carbon/ton tax (rising at 2%/year in real terms) would raise \$1.6 trillion in gross revenue over ten years.

However, imposing a carbon tax can change the revenues from other taxes and the cost of goods and services that the government buys. Thus, the most relevant figure isn't gross revenue, but net revenue: the amount of revenue left after accounting for those other changes to the government budget. The Joint Committee on Taxation (JCT) and CBO impose a standard offset factor (informally known as a "haircut") to account for effects of indirect taxes (such as a carbon tax) on revenue from other taxes: it reduces the amount of revenue available by 25%.¹⁸ To the extent that the carbon tax affects the overall size of the economy, those effects will also influence net revenue (with greater economic growth implying more net revenue relative to gross revenue from the tax).

Applying that standard offset reduces the gross estimates in Carbone et al. (2013) and Marron et al. (2015) to net revenue of \$1.7 trillion and \$1.2 trillion, respectively, over the next ten years. This still represents a large amount of revenue. By way of comparison, the corporate income tax is estimated to bring in \$4.6 trillion in revenue over that period, the total of all excise taxes \$1.1 trillion, and the estate and gift tax \$246 billion, and the primary budget deficit over that period is projected to be \$2 trillion (CBO 2015). Thus, a carbon tax could finance substantial reductions in other taxes or in the budget deficit.

¹⁸ The rationale for this standard offset is that for a given total amount of total economic activity, each dollar of indirect tax revenue will reduce total wage and profit income by a dollar, thus reducing revenue by the amount of tax that would have been collected on that dollar. If tax rates average roughly 25%, then this implies a correction factor of roughly 25%. Note that this does not include any effects on the overall size of the economy.

iii. Effects of a Carbon Tax on Economic Growth

By itself, a carbon tax is likely to slow economic growth slightly. Fossil fuels are used throughout the economy, and thus taxing carbon acts as an implicit tax on all production. This lowers the return to factors of production such as capital and labor (either directly, though effects on wages and profits, or indirectly, by raising product prices and lowering real returns), and thus discourages work, saving, and investment.

This effect is significant but not dramatic: Carbone et al. (2013) estimates that a \$30/ton carbon tax would reduce GDP by roughly 3.5% in 2050.¹⁹ Note that the figure expresses a difference in GDP levels, whereas we usually hear about GDP growth rates. A 3.5% difference in GDP levels 35 years from now is equivalent to roughly a 0.1% difference in average annual growth rates over that time.

That estimate assumes that the entire revenue from the tax is returned to households in lump-sum transfers. If the revenue is used in some alternative way that provides a boost to growth, such as cutting marginal tax rates, reducing the budget deficit, or funding growthenhancing public goods, then this would reduce or even reverse the drag on GDP. For example, Carbone et al. (2013) finds that using the net revenue from the carbon tax to fund cuts in taxes on capital income, reverses the effect on GDP, leading to a roughly 1.3% higher level of GDP in 2050.

Williams and Wichman (2015) review estimates for the effect of a carbon tax on growth from a range of models, carbon tax rates, and uses of revenue, and all of them lie between the

¹⁹ This section focuses on effects on GDP because it is an easily understood measure of economic growth. However, it is worth noting that GDP only measures the value of market goods and services, and leaves out many other goods that are valuable but not sold in the market (for example, the value of leisure time or of goods produced at home, such as childcare and home-cooked meals). Many studies find that using GDP overstates the cost of a carbon tax relative to more complete measures of economic well-being (such as equivalent variation).

two estimates cited in the previous two paragraphs. Most cluster around a 0.5% to 0.7% lower level of GDP by 2040, with higher GDP estimates associated with revenue used for capital tax cuts and lower estimates associated with revenue used for lump-sum rebates and/or with extremely high carbon tax rates.²⁰

C. Distribution of the Cost of a Carbon Tax

The aggregate effects of a carbon tax are important, but they are certainly not all that matters. The distribution of those effects is also important for both equity and political reasons. This sub-section considers how the costs of a carbon tax are distributed across income groups and across states and regions of the US. Note that it focuses only on the distribution of the costs of the tax (and distributional effects of potential uses of the carbon tax revenue). It does not consider the distribution of the environmental benefits from a carbon tax (the avoided damage from climate change), which could easily be just as important as the distribution of costs, but is much harder to estimate.

i. Distribution across Income Groups

It is natural to think that a carbon tax will be quite regressive. Its most obvious effect is to raise the prices that consumers pay for direct energy goods: electricity, natural gas, gasoline, heating oil, etc. And these goods represent a larger share of the budget for poor households than for wealthier households.

Williams et al. (2015) shows that the burden imposed by higher prices for direct energy goods caused by a carbon tax, expressed as a percentage of income, is roughly five times as large for the bottom income quintile (the poorest 20% of households in the US) as it is for the top

²⁰ For example, NERA (2013) estimates a 3.4% lower GDP in 2050 for a case that reduce carbon emissions by 80% in 2050 – which in their model requires a carbon price of almost \$1,000/ton.

income quintile. Those figures are based on current-year income, and it is well-known that such measures tend to overstate how regressive increases in consumer prices are, relative to measures based on income over a longer term (or proxies for longer-term income such as current-year consumption). But even using estimates from Hassett et al. (2009) based on current-year consumption, the burden from price increases for direct energy goods is 2.5 times as large for the bottom decile as for the top decile.

However, the effects of a carbon tax on consumer prices go well beyond just the effects on direct energy goods. Every good in the economy has some energy use somewhere in its production process, and almost certainly some associated carbon emissions, so one would expect a carbon tax to influence the prices of all goods. Direct energy goods account for only about half of all carbon emissions in the US. And the effects on the prices of other goods are spread much more evenly through the income distribution. Hassett et al. (2009) find that when using measures based on current-year consumption, the distribution of this indirect burden is slightly progressive, though very close to equal across the income distribution. Thus, taking into account the effects on all prices, not just prices of direct energy goods, shows that the carbon tax is not as regressive as it might first appear.²¹

Moreover, a carbon tax doesn't just affect prices of consumer goods, it can also affect sources of income such as wages and returns to capital. Most studies of the distributional effects of carbon taxes (or carbon pricing in general) miss those effects because they assume that the entire carbon tax is passed forward into product prices. In fact, some portion of it will be passed backward, affecting the prices of factors of production used to produce carbon-intensive goods.

²¹ Grainger and Kolstad (2010) and Mathur and Morris (2014) find generally similar results to Hassett et al. (2009). In addition, Grainger and Kolstad (2010) find that adjusting for household size makes the carbon tax somewhat more regressive, and both papers look at policy options to reduce the regressivity of the tax.

The few studies that include effects on sources of income find that these effects make the carbon tax more progressive. Carbon-intensive goods tend also to be capital-intensive in production, so a carbon tax causes a drop in capital demand relative to demand for labor. Moreover, even to the extent that the tax is passed forward into product prices, this also raises the price of capital goods, acting as an implicit tax on capital.²² Together, these effects cause the carbon tax to fall disproportionately on capital income relative to labor income, and capital income goes disproportionately to higher income people. Moreover, income from government transfers – which goes disproportionately to poorer households – are typically indexed for inflation, and this helps compensate poorer households for the consumer price effects of the carbon tax.²³

Williams et al. (2015) finds that effects on incomes substantially reduce the regressivity of a carbon tax, though the tax remains slightly regressive. Rausch et al. (2011) finds an even stronger result, with these effects sufficient to make the carbon tax slightly progressive.

Finally, the use of the revenue from the carbon tax can dramatically influence the overall distributional implications of the policy. Williams et al. (2015) find, for example, that using carbon tax revenue to cut taxes on capital income makes the top income quintile better off (even ignoring any environmental gains) while making the other four quintiles worse off (with the loss getting larger as a percentage of income as one moves down the income distribution). Conversely, returning the revenue via equal-per-capita lump-sum transfers to households makes the bottom three quintiles better off and the top two worse off (with the gain getting smaller or

²² Many economists incorrectly view a carbon tax as having similar effects to a broad-based consumption tax such as a VAT, because they see it as raising consumer good prices. But the carbon tax implicitly taxes all production – whether used for consumption or investment.

²³ This point was first made by Parry and Williams (2010) and then was studied in more detail by Fullerton et al. (2011).

the loss getting larger as one moves up the income distribution). Returning the revenue via cuts in labor taxes falls in between, with a roughly flat distribution of burden. Marron et al. (2015) finds quite similar results using a substantially different model.

Those results indicate that the use of the carbon tax revenue is more important than the effect of the carbon tax itself in determining the overall distributional effect of the policy. The carbon tax by itself is mildly regressive. Combining it with a regressive use of revenue (such as a cut in taxes on capital) makes it substantially more regressive. Combining it with a progressive use of revenue (such as lump-sum transfers) makes it substantially progressive.

ii. Distribution across States or Regions

The distribution of the costs of a carbon tax across states or regions of the US is generally more even than the distribution across income groups. Although there are strong geographic patterns to the use of particular energy goods (e.g., heating oil use is strongly concentrated in the Northeast, and electricity use is highest in the South because of air-conditioning demand), consumption of energy goods as a whole is spread relatively evenly across the country. And just as with the distribution across income groups, the effects of a carbon tax on the prices of goods that are not direct energy goods are spread more evenly across the economy. Thus, the effect of a carbon tax on consumer prices is estimated to be relatively flat across different regions of the country.

For example, Hassett et al. (2009) estimate that the burden of a carbon tax varies by only 20% across regions (i.e., the region with the lightest burden bears a tax burden that is 20% smaller as a percentage of income than the region with the heaviest burden), a range that is much narrower than the variation across income groups. Moreover, that study finds that which regions

bear the heaviest and lightest burdens varies substantially from year to year. Mathur and Morris (2014) find similar results.

Williams et al. (2014) looks at the effects not just on consumer prices, but also on sources of income (wages, returns to capital, and government transfers) by linking to a computable general-equilibrium model. Again, the distribution of burdens across states is relatively flat. And, just as with the distribution across income groups, the use of the revenue from the carbon tax is important for the distribution of costs across states. Returning the revenue via lump-sum transfers benefits relatively low-income states, such as those in the Southeast and Appalachia. Using revenue to cut taxes on capital income benefits states with large shares of income from capital, such as Florida and relatively high-income coastal states. Returning the revenue via cuts in taxes on labor income leads to a net cost that is nearly flat across states.

4. Motor Fuel Taxes

While a carbon tax is the largest and likely most important potential new environmental tax, motor fuel taxes (taxes on gasoline and diesel fuel) are by far the most important existing environmental tax, accounting for more than 90% of environmental tax revenue in the US (and playing a similarly dominant role in nearly all other industrialized nations). This section focuses on motor fuel taxes, with the first subsection considering research on the efficient rates for these taxes, and the second subsection focusing on their distributional effects.

A. The Efficient Level of Motor Fuel Taxes

Motor vehicle use has many negative externalities including environmental externalities such as emissions of greenhouse gases and local air pollutants, as well as other externalities such as traffic congestion and vehicle accidents. The most economically efficient approach would be to correct each of these externalities with a policy specifically targeting that externality: for

example, a corrective tax aimed at traffic congestion would charge tolls that vary across roads and times of day, with the toll being highest when traffic congestion is at its worst, and falling to zero when a road is empty. The gasoline tax is a very blunt instrument by comparison. But there are practical difficulties with imposing a full set of policies to address those externalities, and it is much easier to adjust the level of existing motor fuel taxes. And regardless of why, to the extent that those other externalities are not fully corrected, they will influence the efficient level of taxes on motor fuels.

A naïve analysis would simply estimate the average level of each of those externalities on a per-gallon basis and add them up to calculate the efficient level for a corrective tax. For externalities that are directly proportional to the amount of fuel burned (such as carbon emissions), that's the correct approach, but not for other externalities. For example, suppose that a particular driver's contribution to traffic congestion is proportional to how much driving he does. If he responds to a higher gasoline tax only by driving less, then the reduction in the externality is directly proportional to the drop in fuel use. But if the higher tax also causes the driver to buy a more fuel-efficient car, then the reduction in the traffic externality is smaller than the drop in fuel use – and in that case, because the gas tax does less to address the traffic externality, that externality adds less to the efficient level of the tax.

Parry and Small (2005) review the various externalities associated with driving and also take into account interactions with the rest of the tax system (as discussed earlier, in Section 2.A.ii); they calculate the efficient tax on gasoline as approximately \$1.01/gallon (in 2000 dollars).²⁴ West and Williams (2007) find that higher gasoline prices boost household labor supply (more than one would expect based simply on income effects), and that this further raises

²⁴ In comparison, they find that a naïve calculation, simply adding up the externalities, would suggest a much higher rate of \$1.76/gallon.

the efficient gas tax, to \$1.12/gallon.²⁵ Converting that to 2015 dollars implies an efficient tax rate of \$1.55/gallon. That is far above the current combined federal and state tax on gasoline, which averages 48.69 cents/gallon, and ranges as high as 73.7 cents/gallon (in Pennsylvania).²⁶

Far fewer studies look at the efficient level of taxes on diesel fuel, but the efficient tax on diesel fuel used by passenger cars should be roughly similar to that for gasoline, with some upward adjustment based on the greater greenhouse gas and local air pollution emissions per gallon, and the higher average miles per gallon (which magnifies per-mile externalities when converted to a per-gallon basis). Parry (2008) finds that the optimal tax on diesel fuel used by heavy-duty trucks is \$1.12/gallon (a figure that appears to be in year 2000 dollars, equivalent to \$1.55/gallon in 2015). Again, this is well above the current average combined federal and state diesel tax rate of 54.41 cents/gallon (API, 2015).

B. Distributional Implications of Motor Fuel Taxes

One major argument against increasing taxes on gasoline is that such a tax is regressive: lower-income households spend a larger fraction of their budgets on gasoline than do wealthier households. Unlike with other energy goods, this doesn't hold throughout the entire income distribution – the very poorest households are less likely to own cars – but it does hold for most of the income distribution.

As noted earlier, in section 3.C, studies based on one year's income tend to make taxes on consumer goods look more regressive than studies based on income over a longer time period (or proxies for longer-term income, such as expenditures). Poterba (1991) showed that this

²⁵ This figure again is in 2000 dollars, and is based on the externality estimates taken from Parry and Small. Of that total, 5 cents comes from carbon dioxide emissions, 16 cents from emissions of local air pollution, 29 cents from traffic congestion, 24 cents from accidents, and an additional 26 cents because the gasoline tax is a more efficient revenue-raising tax than the income tax.

²⁶ See American Petroleum Institute (2015).

effect was important for analysis of the gas tax. West (2004) and West and Williams (2004) pointed out that lower-income households have more elastic gasoline demand than higherincome households, and that this lowers the burden they bear from a price increase, making the gas tax less regressive than if the elasticity were constant across incomes.

Nonetheless, even after taking those effects into account, the gas tax is still somewhat regressive. West and Williams (2004) find that the burden of a gas tax is highest for the second-lowest income quintile and lowest for the top quintile, though it is relatively flat across the bottom four quintiles: they estimate that raising the gas tax to the efficient rate (an increase of roughly \$1/gallon) would impose a burden of 2.78% of annual expenditures for the bottom quintile, and 3.01% 2.88%, 2.49% and 1.60% for the second through fifth quintiles, respectively.

5. Environmental and Energy Tax Credits and Deductions

Many of the current environmental and energy provisions in the US tax code are not environmental or energy taxes but rather tax credits, exemptions, and deductions. Rather than taxing pollution, energy use, or similar activities that government wants to discourage, these tax expenditures are implicit subsidies. This section briefly reviews two of the larger energy and environmental tax expenditures, discusses their effects, and considers whether they could be removed or replaced with more efficient alternatives.

A. Tax Credits for Renewable Electricity Generation

The renewable energy production tax credit (PTC) provides a tax credit of 2 cents/kWh of electricity generated from qualifying renewable sources (primarily solar, wind, and biomass). Alternatively, firms can take a investment tax credit (ITC) of 30% of the cost of investing in qualifying generating equipment. These credits substantially lower the cost of generating power from renewable sources, and thus encourage use of renewable energy.

This policy can be viewed as correcting a pollution externality, to the extent that renewable power substitutes for other more polluting sources of electricity (and that those pollution externalities are not already corrected by other policies). One might also argue that the policy addresses externalities in technology development (such as research and development spillovers), though that justification is more tenuous, given that these are not brand-new technologies and the US represents a relatively small share of world demand.

Nordhaus et al. (2013) looked at the effects of the PTC and ITC on carbon emissions, and found relatively small effects: eliminating these provisions would increase carbon emissions by roughly 360 million metric tons, less than 0.3% of US energy sector emissions. Moreover, this is a relatively expensive way to reduce carbon emissions: the government gives up more than \$250 in tax revenue per ton of CO_2 reductions.²⁷

Thus, if the goal of the PTC and ITC is to reduce carbon emissions, these credits are a relatively expensive way to achieve that goal. A carbon tax – even one with a very low rate – would do much more to reduce emissions, and at a lower cost.

B. Depletion Allowances for Oil and Gas Wells

Owners of oil and gas wells can deduct a depletion allowance, which is intended to reflect the decline in the value of oil and gas reserves as those reserves are extracted and sold. That depletion is a cost and thus should be deductible, just as other business costs are. However, independent companies producing in the US are allowed to use percentage depletion – deducting a percentage of gross income associated with the sale of the oil and/or gas – which typically

²⁷ Note that revenue cost is not the same thing as the economic cost of the policy, and unfortunately the model used could not provide estimates of social cost. Nonetheless, this suggests that the policy is quite costly relative to its modest effects, which is consistent with theoretical results that such subsidies are inefficient relative to emissions pricing policies.

allows for deductions that exceed the actual cost of acquiring and developing the resource. Thus, the difference between percentage and cost depletion represents an implicit subsidy to oil and gas production by independent producers. The JCT estimates that the difference reduced tax revenue by \$4.1 billion over the 2010-2014 period.

This subsidy is difficult to justify on economic grounds. There is no obvious positive externality associated with domestic oil and gas production. "Energy security" is sometimes used as an argument for domestic production, but it is not clear why this represents an externality, nor is it clear that promoting depletion of reserves enhances energy security (indeed, one could argue that energy security is greater if those reserves are left in the ground so that they can be used later in case of an energy crisis). The subsidy today largely benefits natural gas producers, and gas is a relatively clean fuel, which suggests there might be some environmental justification. But Nordhaus (2013) finds that eliminating percentage depletion would actually reduce greenhouse gas emissions slightly (a net drop of 37 million metric tons per year).

6. Conclusions

This paper has reviewed major potential environmental and energy tax changes. It has focused primarily on a carbon tax but also considered potential changes to the taxes on motor vehicle fuels (currently by far the largest environmental taxes in the US today) and to two of the largest environmental and energy tax expenditures.

A carbon tax represents a cost-effective way of reducing greenhouse gas emissions. Research suggests that an efficient carbon tax would be imposed on the carbon content of fossil fuels at a rate equal to the social cost of carbon (SCC), which is currently estimated at roughly \$45/ton, and would rise slowly over time, reflecting the projected rise over time in the SCC of roughly 1.5% to 2% per year.

Such a tax would likely slow economic growth, but that effect is very small, especially if the tax revenue is used in ways that promote economic growth, such as cutting marginal rates of other taxes, reducing the budget deficit, or financing growth-enhancing public goods. The tax would also be mildly regressive, imposing a slightly higher burden on lower-income households than on higher-income households, though much less regressive than it is widely perceived to be. Moreover, this regressivity could be overcome if some of the revenue is used in a progressive way.

Taxes on motor fuels are also well below economically efficient levels, by roughly \$1/gallon. These taxes are somewhat regressive.

Finally, the two tax expenditures considered – the production and investment tax credits for renewable energy and percentage depletion for oil and gas – have relatively small environmental effects. Both provide environmental benefits, but at relatively high cost. A carbon tax would do far more to reduce pollution emissions, and in a much more cost-effective way. Percentage depletion is slightly damaging to the environment, and is generally difficult to justify based on economic efficiency arguments.

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