

Measuring and Managing Liquidity Risk

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Measuring and Managing Liquidity Risk

Antonio Castagna and Francesco Fede



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AC: To Tatiana, for the patience she almost never lost FF: To my wife, Gabriella, for her love, patience and support

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The outbreak of the financial crisis in 2007/2008 brought liquidity risk measurement and management to the attention of practitioners, regulators and, to some degree, academicians.

Up until then, liquidity risk was not considered a serious problem and was almost disregarded by risk control systems within banks and by international and national regulations. Liquidity management and fundraising was seen as routine activity, simply a part of more complex banking activity, deserving little attention or effort.

Although the savvy approach would always be to forecast and devise scenarios under which extreme conditions occur, it was barely conceivable that such a difficult economic environment like the financial crisis of 2007 could ever occur. In the economic and financial environment in which banks used to run their business before 2007, liquidity risk simply did not exist. Moreover, it was never considered a problem that could possibly extend beyond the limits of organizational issues and the development of basic monitoring tools. The design of procedures and systems were believed to cope with the small effects that banks suffered from liquidity risks.

As a consequence of these general considerations, the theory of liquidity risk was vague and restricted typically to market liquidity risk, which is the risk that assets cannot be sold swiftly in the market at a price close to the theoretical value. Although this is an important aspect of the broader liquidity risk notion, nonetheless it is just a small part of the full story, and in most cases not one strongly impacting banking activity. The only literature available on the aspects of liquidity risk concerning banking activity was mainly written by practitioners working in the industry and by a few academics. A notable example, among a few others, is the book edited by Matz and Peter, Liquidity Risk Measurement and Management: A Practitioner's Guide to Global Best Practices [87], which presents an excellent overview of the most relevant issues in liquidity risk management.

We felt there was a gap, though, between the need for improved practices after the events of 2007/2008, and what was proposed in the available research. The above-mentioned book by Matz and Peter was published in 2007 and, of course, could not deal with the increased requirements for risk liquidity practices.

This book tries to cover this gap: it should be seen as an attempt to introduce new tools and methods to liquidity risk measurement and management. We do not dwell on every facet of the subject; in particular, problems that are more related to organization

and mechanisms that involve higher levels of management to cope with specific liquidity crises, are only briefly analysed for modifications that could be made to existing best practices in the current financial environment.

The book is organized in three parts. Part I is an overview of the crisis in 2007 and describes how it became globalized from the US economy to the rest of the world and how it altered its form during the subsequent years, up until 2013 (when this book was written). In Part I we also show how the banking business is changing (or will be forced to change) in response to the dramatic events that occurred. These triggered a regulatory overshoot the traits of which are extensively investigated towards the end of Part I (Chapters 4 and 5). One of the most challenging tasks was actually updating chapters in the face of (still) continuously evolving regulation, which represents one of the current main drivers of the liquidity framework. For this reason, this will most likely be the part of the book doomed to becoming outdated the quickest and no longer state of the art. The regulations mentioned and studied in this book are accurate at the time of writing in January 2013. Regulations that have been updated since January can be found at the book's website http://www.wiley.com/go/liquidityrisk

Moving from a macroeconomic point of view, we analyse the different types of liquidity risk and how they impact on a bank's business activity, in order to find how best to manage it from a microeconomic point of view, based on analysis of the actual structure of the balance sheet and of a comprehensive framework for pricing, monitoring and managing liquidity risk.

In Part II we start quantitative study of liquidity risk, first by introducing standard tools to monitor it: it is here we show how these tools can be enhanced and extended to cope with a substantially more volatile market context. The guiding principle is to draw approaches and models from the robust and thorough theory developed to evaluate financial contracts and to apply them, with a slight shift of perspective, to the measurement and management of liquidity risk. For this reason we stress the importance of concepts such as "cash flow at risk" and "liquidity at risk" that are not new, but have never really been widely adopted in the banking industry.

Starting with Part II, the reader will soon realize that topics are discussed as if there were a sort of pendulum, constantly swinging from fundamental concepts, hinging most of the time on balance sheet analysis and involving basic math (algebraic summation), to complex modelling with stochastic processes, grounded on rather heavy mathematical approaches. We would like to make it clear we have not really created new models to measure the liquidity risk, although in a few cases we actually do so. We only want to show how to apply already available theoretical frameworks and extend their use in the liquidity risk field. For example, we show how to adapt the option pricing theory approach to liquidity risk measurement and management.

Hopefully, our intent will be clear when the chapters devoted to the modelling of market risk factors and behavioural models are read. In these chapters we used a number of instruments, available in the theoretical toolkit prepared for the valuation of derivative contracts, to solve specific problems related to liquidity risk. We left aside our initial fear and opted, like pioneers in unexplored territory, to take routes that eventually may prove not to be optimal or even wrong, but our aim was to show a different mindset when approaching the liquidity risk problem rather than to provide the best solutions.

We must acknowledge that others have tried to adopt a similar approach; namely, Robert Fiedler [89] and, more recently, Christian Schmaltz [109]. Continuing in their footsteps, we applied a bottom-up method by modelling the main items of a bank's balance sheet. In theory, the bank is then able to simulate the entire balance sheet on a very granular basis, allowing for a rich set of information that can be extracted for liquidity risk purposes.

The theoretical apparatus developed for derivative contract evaluation is even more fruitful because modern liquidity risk does not only refer, as typically in the past, to the quantitative dimension of cash flow imbalances. In fact, a new and sometimes even more important dimension is the cost of liquidity that financial institutions can raise in the market. The dramatic increase in the levels and volatility of funding spreads paid over the risk-free rate is a factor that definitely cannot be disregarded in the pricing of contracts dealt with clients and the more general planning of banking activity. This is why we devoted the third and final part of the book to the analysis of this topic.

We start Part III with definitions of funding costs and counterparty risk and the interrelations between them, which demonstrate that banks are ultimately forced to consider the cost to raise liquidity in the market as a business-related factor that cannot be hedged. We present a new framework to model funding costs keeping in mind the multiplicity of sources and the dynamicity of the activity. We introduce a novel measure of risk implicit in the rollover of maturing liabilities and we show how corresponding economic capital should be allocated to cope with it and how corresponding costs should be included in the pricing of products a bank offers to its clients.

The inclusion of funding costs is much more subtle when dealing with derivative contracts; this is why we dwell in the final chapters of the book on possible approaches to dealing with them and point out how the classical results of option pricing theory are modified when these additional factors are taken into account in the evaluation process.

In conclusion, we would like to thank everyone who helped us in elaborating the ideas presented in the book. The list would be so long and would involve so many colleagues, who have analysed and discussed these topics with us over recent years, that not only would many pages be required to name them all, but we would also run the serious risk of forgetting someone.

However, Francesco would like to thank his employer (Banca IMI) and bosses for creating a conducive and stimulating environment, in which many topics treated in this book have found continuous reference regarding analysis and applicability; many friends and colleagues, within the counterparty risk management desk and financial engineering desk, the Finance & Investments Department and the Capital Market Department of Banca IMI, the risk management desk and treasury desk of Intesa Sanpaolo, who have always been ready to exchange ideas and interesting opinions and contributions about these topics; last but not least, to all colleagues of the market treasury desk, for their friendship, support and constructive example set during their daily activity. Obviously, the book expresses only the views of the authors and does not represent the opinions or models of Francesco's employers (Banca IMI and Iason).

Finally, we want to acknowledge a number of people to whom we owe a special debt of gratitude. In particular, Raffaele Giura, of Banca IMI, who constantly discussed with us many of the issues covered and always gave us insightful and fruitful perspectives to examine in depth. Antonio discussed many of the ideas related to the liquidity of derivative contracts with Fabio Mercurio. Caterina Covacev and Luca Visinelli, of

Iason, contributed massively to refining some of the models presented, to writing the code to test them and to preparing the examples. Finally, Francesco Manenti, of Iason, helped us to estimate and test behavioural models for non-maturing liabilities.

Although the book is a joint work, during its writing we split the tasks so that Francesco mainly dealt with the topics in Part I, whereas Antonio focussed on Parts II and III. We hope the reader will find the text conducive to a better understanding of liquidity risk and perhaps go on to develop and improve the ideas outlined.

Antonio Castagna Francesco Fede Milan, January 2013

About the authors

Antonio Castagna is currently partner and co-founder of the consulting company Iason Ltd, focusing on the design of models to price complex derivatives and to measure financial, liquidity and credit risks. Previously he was with Banca IMI Milan, from 1999 to 2006, where he first worked as a market maker of caps/floors and swaptions and then he set up the FX options market-making desk. He started his career in 1997 at IMI Bank Luxembourg, in the Risk Control Department. He graduated in Finance at LUISS University in Rome in 1995. He has written papers on different issues, including credit derivatives, managing exotic options risks and volatility smiles and is also the author of FX Options and Smile Risk, Wiley.



Francesco Fede is a graduate of the LUISS University of Rome. He has worked for IMI Bank Luxembourg as financial controller and risk manager since 1996. In 1998 he moved to Banca IMI Milan, where he started his career as short-term interest derivative trader in 2001. Since then, he has covered many tasks in Treasury and ALM activities. Currently he is the head of the Market Treasury desk of Banca IMI. Over the last couple of years he has focused on the pricing of liquidity risk for structured loans and derivative products, and on the impact of liquidity risk on both the trading book and banking book.



Abbreviations and acronyms

ABCP Asset Backed Commercial Paper

ABS Asset Backed Security
AFS Available For Sale

AIG American International Group
ALM Asset Liability Management
ASF Available Stable Funding
bAJD basic Affine Jump Diffusion
BBA British Bankers' Association

BCBS Basel Committee on Banking Supervision

BSL Balance Sheet Liquidity

c.l. confidence level

CBC CounterBalancing Capacity

CC Central Clearing
CCS Cross Currency Swap
CD Certificate of Deposit

CDO Collateralized Debt Obligation

CDS Credit Default Swap

CEBS Committee of European Banking Supervisors

cfAR cash Flow At Risk

CFP Contingency Funding Plan
CIR Cox, Ingersoll and Ross (model)

CM Clearing Membership

CMBS Commercial Mortgage Backed Security

CME Chicago Mercantile Exchange

CP Commercial Paper

CPR Constant Prepayment Rate
CRT Credit Risk Transfer
CSA Credit Support Annex
CVA Credit Value Adjustment

DF Discount Factor

DVA Debit Value Adjustment EAD Exposure At Default

EBF European Banking Federation

EC Economic Capital

EEA European Economic Area EFC Expected Funding Cost

EL Expected Loss

ELoP Expected Loss on Prepayment

EM Empirical Model

ENE Expected Negative Exposure
Eonia Euro overnight index average
FAS Financial Accounting Standards
FASB Financial Accounting Standards Board

FC Funding Cost

FCAVL Forward Cumulated AVailable Liquidity

FFT Fast Fourier Transform FO Financial Option forex, FX Foreign eXchange

FRA Forward Rate Agreement
FSA Financial Services Authority
FSB Federation of Small Businesses
FSB Financial Stability Board
FTO Fine-Tuning Operations
FTP Fund Transfer Pricing
FVA Funding Value Adjustment

FX Foreign eXchange

(G)CDS Global Credit Default Swap

G-SIFI Global-Systemically Important Financial Institution

GDP Gross Domestic Product
HLA High Liquidity Asset
HQLA High Quality Liquid Asset

IAS International Accounting Standards

IASC International Accounting Standards Committee
IFRS International Financial Reporting Standards
ILAA Individual Liquidity Adequacy Assessment
ILAS Individual Liquidity Adequacy Standard

ILG Individual Liquidity Guidance IMF International Monetary Fund

IRS Interest Rate Swap **ISP** Intesa SanPaolo ITA ITAlian Treasury Liquidity Adjustment LA Liquidity Buffer LB Liquidity Buffer Cost **LBC** London Clearing House **LCH** Liquidity Coverage Ratio LCR LEA Liquid Equivalent Adjustment Liquidity Generation Capacity LGC

Liffe London International Financial Futures and Options

Exchange

LLR Lender of Last Resort LMM Libor Market Model

LO Liquidity (Behavioural) Option
LTRO Long Term Refinancing Operation
LVA Liquidity Value Adjustment
LVA Liquidity Value Adjustment
MBS Mortgage Backed Security
MRO Main Refinancing Operation

MTA Minimum Transfer Amount
MTM Mark To Market
MTN Medium Term Note
MVAR Market Value At Risk
NCB National Central Bank
NCO Net Cash Outflow

NINJA No Income No Job (or) Asset
NML Non-Maturing Liability
NPV Net Present Value
NSFR Net Stable Funding Ratio

NSFR Net Stable Funding Ratio
OAS Option Adjusted Spread

OBS Off Balance Sheet

ODE Ordinary Differential Equation
OIS Overnight Indexed Swap
OLS Orthogonal Least Square
OMO Open Market Operation
OMT Outright Monetary Transaction

ON Over Night
OTC Over The Counter
OTD Originate To Distribute

P&L Profit and Loss

PD Probability of Default

PDCF Primary Dealer Credit Facility
PDE Partial Differential Equation
PDF Probability Density Function
PFE Potential Future Exposure

PL Probability of Loss
PSE Public Sector Entity
PVA Price Volatility Adjustment

PVECF Present Value of the sum of Expected Capital Cash Flow

RFV Recovery of Face Value

RAROC Risk-Adjusted Return On Capital

RBS Royal Bank of Scotland RI Refinance Incentive

RMBS Residential Mortgage Backed Security

RMV Recovery of Market Value

ROE Return On Equity

RPM Rational Prepayment Models RSF Required Stable Funding RTGS Real Time Gross Settlement SDE Stochastic Differential Equation

SF Standing Facility
SF Stochastic Factor

SIFI Systemically Important Financial Institution

SIV Structured Investment Vehicle

SLRP Supervisory Liquidity Review Process

SMP Securities Market Programme

SP Survival Probability
SPV Special Purpose Vehicle

TA Total Asset

TAF Term Auction Facility

TARGET2 Trans-European Automated Real-time Gross-settlement

Express Transfer

TARP Troubled Asset Relief Program
TLA Targeted Liquidity Assistance

TN TurNover

TPC Total Prepayment Cost
TRS Total Return Swap

TSECCF Term Structure of Cumulated Expected Cash Flow

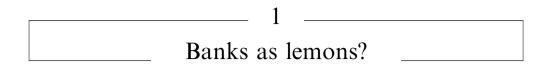
TSECF Term Structure of Expected Cash Flow

TSFCFu Term Structure of Forward Cumulated Funding

TSFu Term Structure of available Funding
TSL_e Term Structure of expected Liquidity
TSLaR Term Structure of Liquidity at Risk

USG USaGe metric
VA Value Added
VaR Value at Risk
ZC Zero Coupon

Part I	
Liquidity and banking activity	
Liquidity and banking activity	



1.1 INTRODUCTION

It was a sunny and warm Thursday of midsummer. Some dark clouds in the previous days suggested that sudden showers had been expected to fall in the short term, but no one would have forecast the magnitude of the incoming financial tsunami.

But, citing L. McDonald [87], Wall Street's most sinister troubles occasionally arrive without the thunder of the guns and the clash of mounted cavalry on the trading floor. Some deadly problems come creeping in unannounced and often unnoticed, when financial players unobtrusively arrive at a single conclusion at around the same time. No one can say anything about collective changes: suddenly there is a lightning bolt of fear crackling through the market, and the consequences are there.

That day was August 9, 2007. Some years later, that day be referred to as the dawn of the worst crisis to hit financial markets in the last two decades. It begun with newswires reporting the announcement by some BNP Paribas funds to freeze redemptions, citing difficulties in valuing their assets due to the lack of liquidity in subprime mortgage markets. In a few hours the international money market had been seriously deadlocked: central banks had to inject an enormous and unprecedented amount of liquidity into the system to settle its daily payment obligations (e.g., the special refinancing operation conducted by the ECB with overnight maturity registered a request record for EUR95 billion; on the same day the Fed injected USD24 billion). The day of reckoning had eventually come: the financial market started the long-awaited process of risk

Box 1.1. Some dark clouds

On July 24 the major US home loan lender, Countrywide Financial Corp., announced an earnings drop. The market rumoured that almost one in four of all Countrywide's subprime loans were delinquent (10% of those were 90 days delinquent or more). With the ABCP market finally faltering, there was no easy access to cheap, fast money for this shadow bank that was going to be in a deadly situation.

On July 30 German bank IKB warned of losses related to subprime mortgage fail-lout: as a consequence the five-year European iTraxx Crossover index reached a peak of 500 bp and liquidity in the European government bond market declined sharply.

On July 31 American Home Mortgage Investment Corp. announced its inability to fund lending obligations, and it subsequently declared bankruptcy on August 6.

reappreciation, which had been evoked by regulators and supervisors several times in previous months.

What was going to happen?

1.2 THE FIRST WAVE

During the previous years the combination of (i) large financial market liquidity; (ii) increasing risk appetite; (iii) rising leverage in market strategies and derivative products led to an aggressive search for higher yield by investors. This process was suddenly reversed when the number of delinquencies in the US hugely increased from early 2007. The related sharp decline in the credit quality in the subprime mortgage market impacted on the fundamentals of structured credit products. It ignited rising concerns that the delinquency rate could have risen to unprecedented levels and led some rating agencies to downgrade several issues of ABS, backed by pools of subprime mortgages. Moreover, they announced a revision of their methodologies for assigning new ratings.

At this point investors realized that (i) risk assessment and (ii) pricing methods for a large proportion of complex instruments were definitely inadequate. These factors produced great uncertainty about the fundamentals of the ABS market and increased trading frictions. At last, they translated to bid—ask spreads that grew wider and wider up to the point where all the ABS markets dried up.

Why did the announcement of these downgrades and methodology revisions impact so heavily on the market and spread far beyond a risk reappraisal and a simple shock related to the subprime sector?

First, claims on the cash flows generated by subprime loans used to be embedded by the financial industry in a broad array of structured credit products (starting with RMBS, followed by CDOs containing some exposure to these RMBS, and ultimately by CDO squared). This partly explained why indirect exposures to US subprime loans through ABS had been widespread much more than initially forecast by regulators and financial firms.

Box 1.2. The phantom menace

On the May 4 UBS shut down its internal hedge fund, Dillon Read, after suffering about USD 125 million of subprime-related losses. In mid-June two hedge funds run by Bear Stearns and involved in the subprime market experienced serious trouble in fulfilling their margin calls, leading the bank to inject USD 3.2 billion in order to protect its reputation. These were not the first episodes about a possible spill-over from the US mortgage market: on the February 27, 2007 global equity markets dropped on fears about Asian equity markets and growing concerns over further deterioration in the US subprime mortgage sector. The relatively small correction (Dow Jones Euro STOXX -8%, S&P 500 -6%) ended on March 14 when equity markets resumed their upward trend.

Banks as lemons?

Box 1.3. The warning of Cassandra

According to Homer, the princess Cassandra was gifted a prophecy by Apollo; but afterwards the god, offended with her, rendered the gift unavailing by ordaining that her predictions should never be believed. Like the Trojan Cassandra, not listened, the former ECB president Jean-Claude Trichet often warned the financial community about the reassessment of risk.

From the Q&A session of the ECB press conference on March 8, 2007:

Question: "When we were all in Madrid last year and the financial markets were doing their gymnastics then, you stressed that an appropriate assessment of risk was not the worst thing in the world and that perhaps some valuable lessons were being learnt. We have a similar situation now, albeit with different kinds of contours, and I wanted to see if you might be of a similar sentiment today?"

Mr Trichet's answer: "Concerning the recent events that we have observed, it is true that the Governing Council of the ECB widely felt—and I would say that it was very largely a consensus, a consensus that I myself have expressed on a number of occasions as the chairman of the G10 group of central bank governors—that we were perhaps in a phase in global finance where risks in general were not necessarily assessed at their real price. This was materializing in the levels of spreads and risk premia and in a number of other considerations, perhaps including low real interest rates. This was our diagnosis. What we have been observing for a number of days has been a certain reassessment of risks on the upside and across the board and a higher level of volatility. This is a phenomenon that we are following very carefully. It has positive aspects, obviously. It represents a more realistic appreciation of risks in general. It must also of course be monitored very carefully because what is of the essence in our view is that such corrections are orderly and smooth and are not abrupt.

On July 10 Chuck Prince, the former Citigroup's CEO, by referring to Keynes' analogy between bubbles and musical chairs, said: "When the music stops, in terms of liquidity, things will be complicated. But as long as the music is playing, you've got to get up and dance. We're still dancing" (see Brunnermeier [38]).

From the O&A session of the ECB press conference on August 2, 2007:

Question: "The current phase of market movements that we see, is that something that you would characterise as a smooth reappreciation of risk or is that something that is abrupt and undesirable?"

Mr Trichet's answer: "We are in an episode where prices that were under-assessing an element of risk in a number of markets are normalising. I will not give any other qualification to the situation: it is a process of normalisation. The first quality to be demonstrated in circumstances when we see significant increases in measures of volatility in a large range of markets and asset classes by market participants and investors, and of course by authorities is to keep their composure. That is something important and it would permit the evolution of the market to be as effective as possible in terms of going back to a normal assessment of risks in general."

Second, questioning the methodology to assign ratings to these products implied questioning underlying assumptions about the distribution of returns on a wider variety of ABS products. ABS secured by pools of different assets, such as corporate bonds, bank loans, automobile loans and credit cards, were structured, rated and priced by using a similar methodology. Investors abruptly realized that similar properties could no longer be used for both corporate bonds and structured credit products. Without essential data about rating transition probabilities and market liquidity risk, they could no longer quantify the risk in these structured products with any degree of confidence. Many of these instruments, tailor-made to the risk-reward profile of investors and illiquid by definition, were valued by models. These models no longer worked when input data, such as market prices for ABS indices, were either not available or unreliable. Then the calculation of the fair value for most products became simply impossible.

Other market sectors were already negatively influenced: the issuance volumes of CDOs/CLOs registered a sharp decline. Growing uncertainties toward those products led to widespread refusal by financial investors to maintain their ABCP when they matured. Some ABCP issuers had to roll their debt into issues of only a few days' maturity: as a result, the average maturity of new issued paper significantly lowered. The weekly figures published by the Fed, unknown until then by a large part of market players, became one of the principal market drivers. Going on, this risk reappreciation process hit the refinancing strategies of SPV/SIV: with their usual funding channels dried up, they had to draw on their committed credit lines from their sponsoring banks. In the first half of August two German banks, IKB and Sachsen LB, were unable to honour their liquidity and credit commitments. Given the aggregate large exposures relative to the size of the sponsoring banks' balance sheets, after hectic negotiations, emergency rescues from a number of other financial institutions had to be arranged.

Under the ongoing pressure of the turmoil, financial firms finally began to wonder about the soundness of their liquidity policies. Some of them were targeted by bank runs and heavily hit by the growing credit crunch. As a result a number of small credit institutions failed, others were saved by the public sector (Northern Rock in the UK) or the private sector (Bear Stearns).

More enterprises received capital injections from governments (i.e., Citigroup, Royal Bank of Scotland, Fannie Mae, Freddie Mac, Indie Mac). A lot of them recorded profit warnings and credit losses. Spreads in interbank funding and other credit-related products rose sharply and funding strains were experienced in the secured financing market.

In mid-September 2008 the financial turmoil reached its peak. After pre-announcing its disappointing third-quarter figures, Lehman Brothers, one of the four major US investment banks, was unable to raise capital or find strategic investors: it experienced a destructive run on its liquid assets and was forced to file for creditor protection under Chapter 11 on September 15, 2008. On the same day Merrill Lynch accepted being taken over by Bank of America and, only two days later, the giant insurer AIG was rescued by the US government as it teetered on the edge of collapse due to rising requests for post-collateral payments on derivatives trades after its rating downgrading. Eventually, Morgan Stanley and Goldman Sachs decided to transform themselves from investment banks into commercial bank holding companies to gain advantage from lender-of-last-