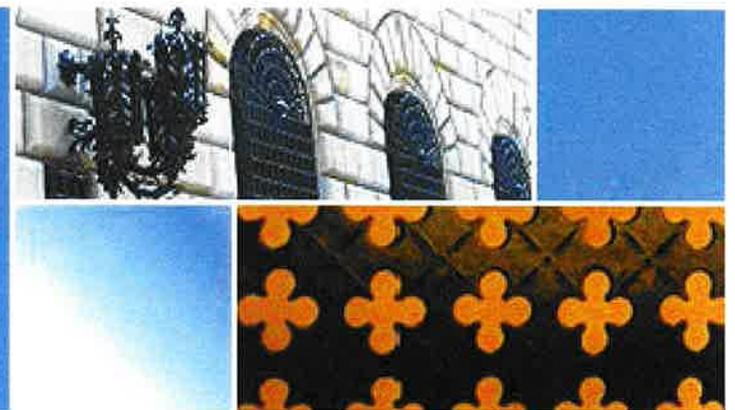


PPNR Modelling Approaches and Development

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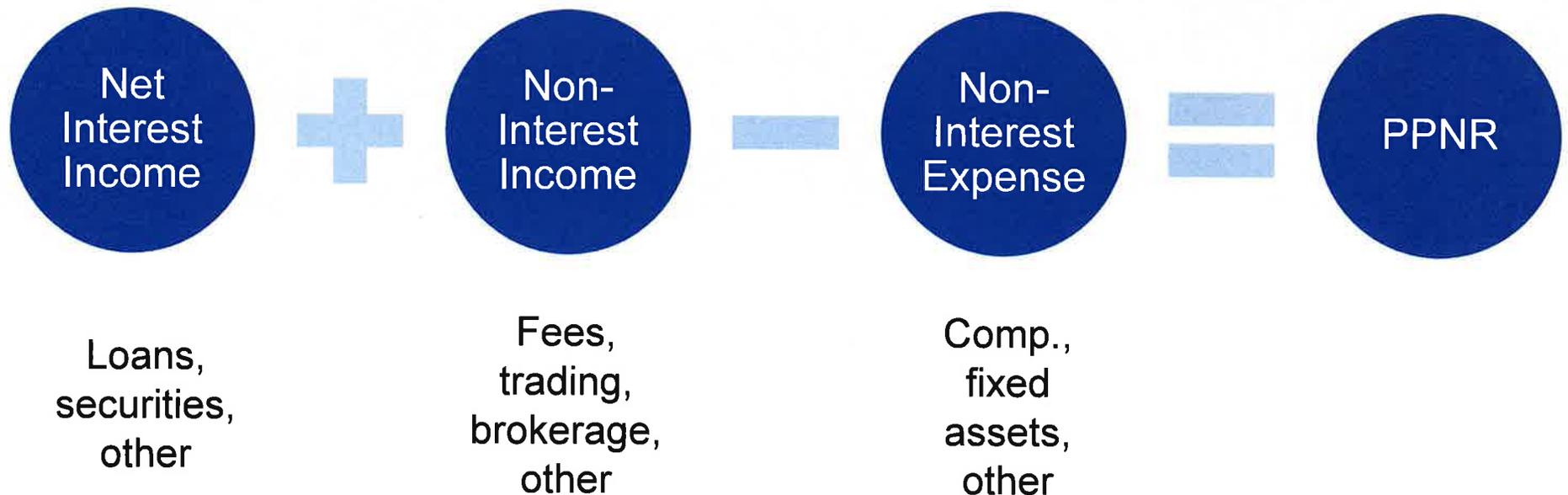
June 24, 2015



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Supervisory Approach to Modelling PPNR

- PPNR is modelled with a collection of 26+ models of components of PPNR



Types of PPNR Models

- **Models of revenues and non-credit-related expenses** expressed as a share of relevant asset or liability balances, and combined with balance forecasts that reflect continued credit intermediation
- Current modelling approaches differ among components:
 - **Instrument level** models calculate ratios from granular information on yields and maturities
 - **Autoregressive models** relate PPNR component ratios to historical ratios, BHC characteristics and macroeconomic variables
 - **Simple models** based on recent firm level performance

Instrument Level Models

- **Long term goal is security / instrument level models**
- For example, subordinated debt:

$$\text{Interest}_{i,t} = \Sigma(\text{Contractual Rate}_{i,t,n})(\text{Balance})_{i,t,n}$$

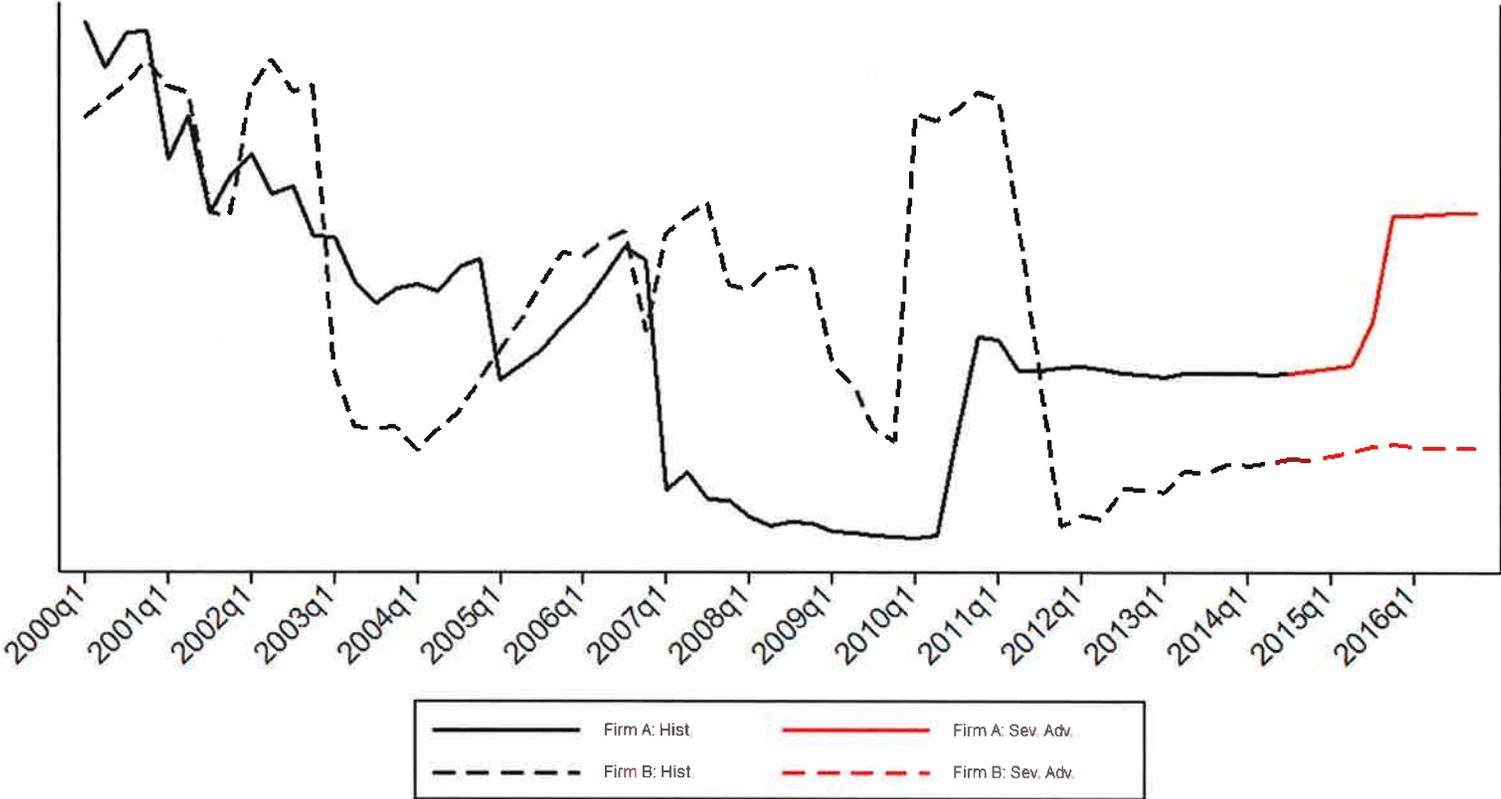
where t indexes time, i indexes firms, and the firm has n securities:

- *Contractual Rate* $_{i,t,n}$: contractual interest rate on security n at time t
 - *Balance* $_{i,t,n}$: balance of security n at time t
- However, still need to model price and maturity of maturing securities and new issuance as well as swaps

Instrument Level Models - Example

- Forecasts now reflect characteristics of current securities and scenarios

Interest Expense on Sub Debt / Sub Debt



Autoregressive Models

- Many components of PPNR models modelled with autoregressive (AR) models:

$$\text{Ratio}_{i,t} = \alpha + \beta_{[1,n]} \text{ratio}_{i,t-n} + \beta_2 \text{macro}_t + \beta_3 X_{i,t} + \varepsilon_t$$

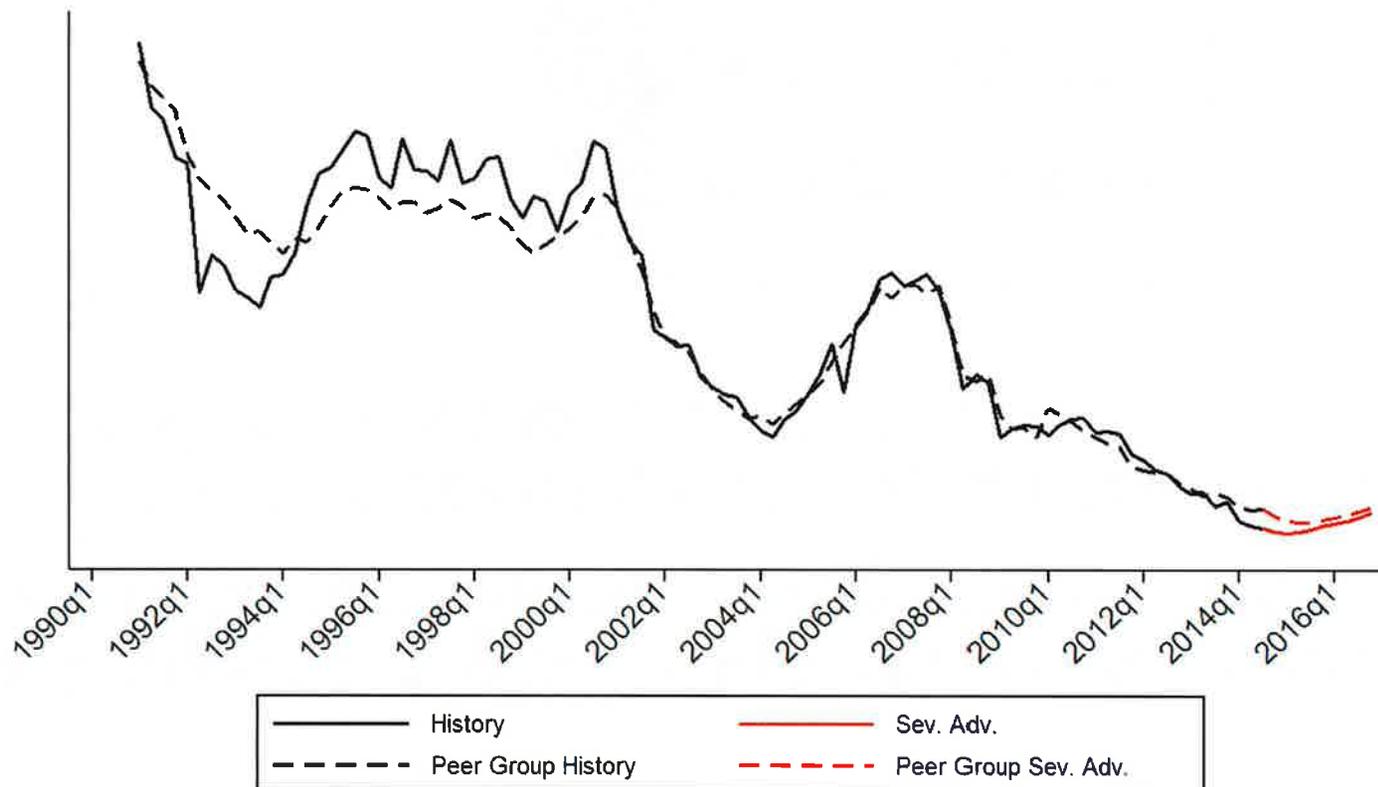
where t indexes time and i indexes banks, and the model has n lags:

- $\text{Ratio}_{i,t}$: financial ratio of interest and ratio_{t-n} is an AR term.
 - Macro_t : macroeconomic variables
 - $X_{i,t}$: includes bank characteristics
- BHC-specific indicator variables (fixed effects) in a limited number of cases

AR Models – Interest Income Component Example

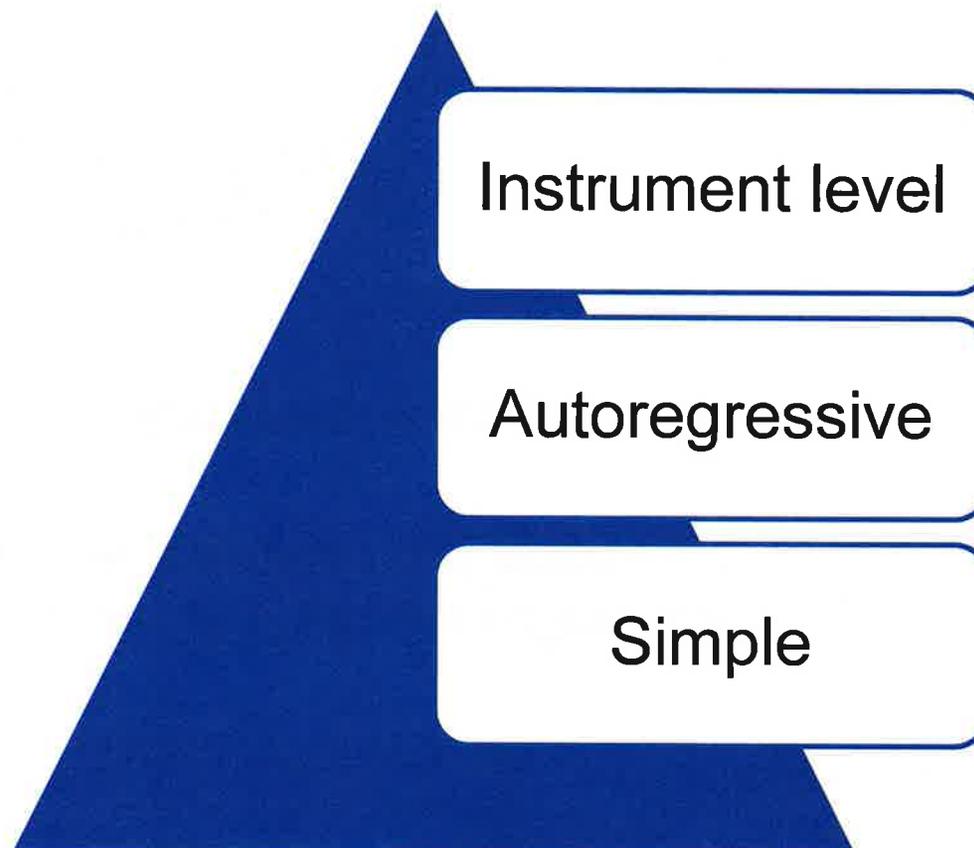
- Forecasts without fixed effects reflect convergence to mix weighted industry average and scenarios

Interest Income on Loans/ Loans



Good, Better, Best?

- Goal is to reflect differences in macroeconomic sensitivity among firms' business models and risk exposures
- However, PPNR inevitably involves modelling new loans and new liabilities as well as existing ones



The Long Run Future of Supervisory PPNR Modelling

- Tradeoffs between better data and a rich historical time series of data

Components of net interest income:

- Goal is to move to instrument / security level models as appropriate

Other components:

- Goal is to combine Y-14 data with other sources that provide a longer time series
- Noninterest income and expense will continue to be modelled in a more “top down” way

Model Enhancements Currently Under Development

- Should firms converge to their own past performance or that of all firms in the industry?

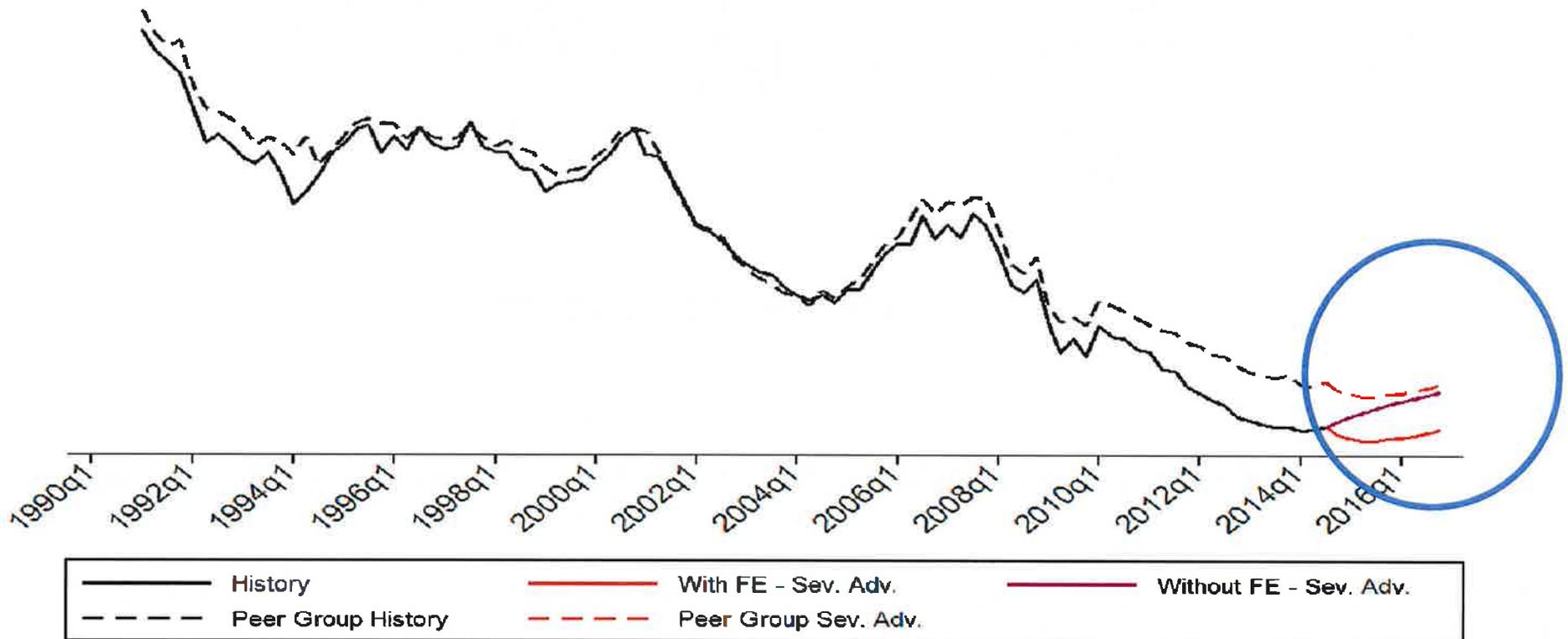
Impact of different approach on projections:

- Generally adding fixed effects produces models more consistent with firms' overall performance
- However, autoregressive coefficients are reduced
 - Reduces impact of very recent performance on forecasts
- Estimating models with fixed effects increases the estimated coefficients on the macro variables
 - Consequently, median forecast with fixed effects models is lower than forecasts without fixed effects in severely adverse scenario (but not necessarily in all scenarios)

Fixed Effects Impact Varies with Firm Performance

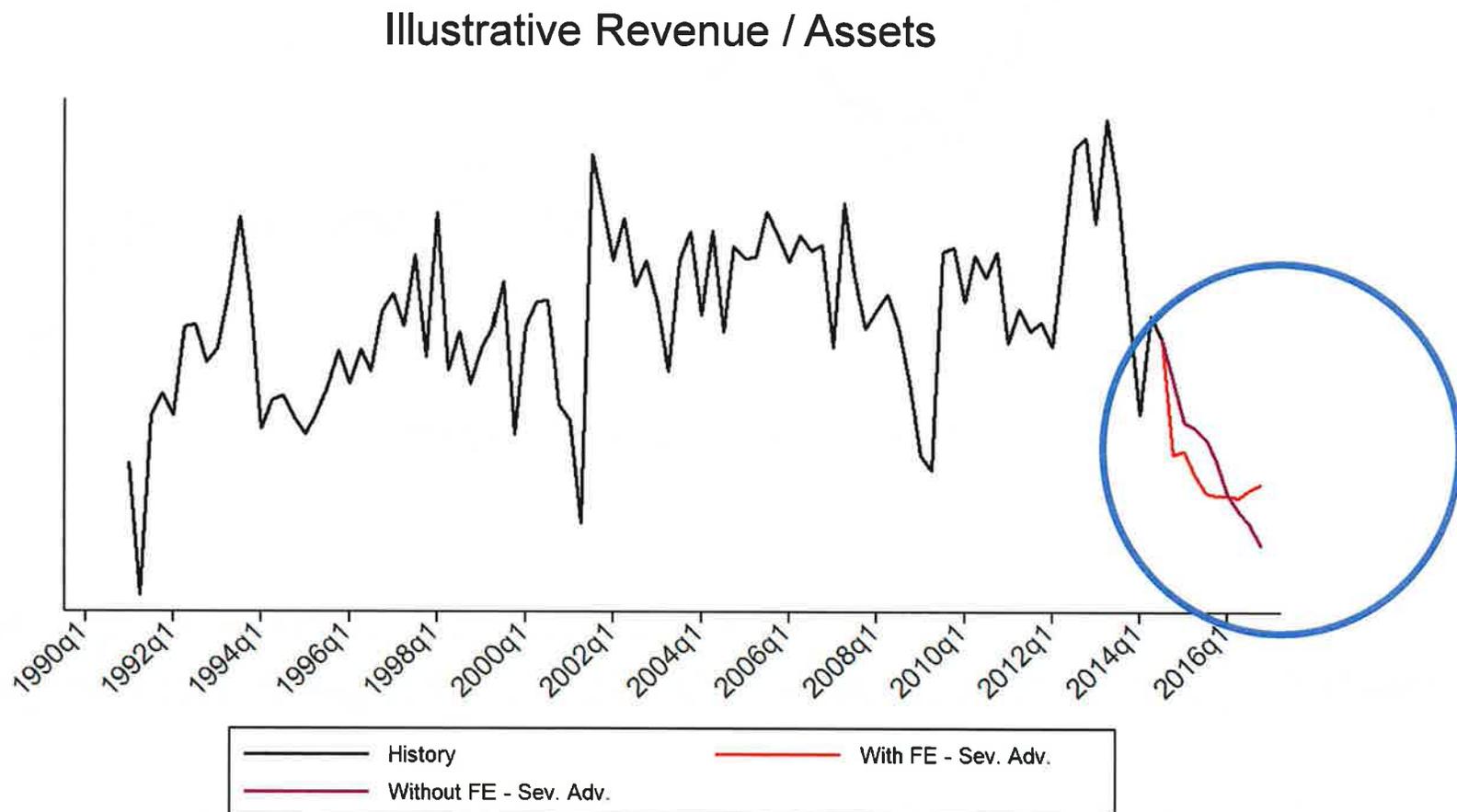
- Without fixed effects, firms converge up (or down) to meet the mix weighted industry average

Interest Income on Loans/ Loans



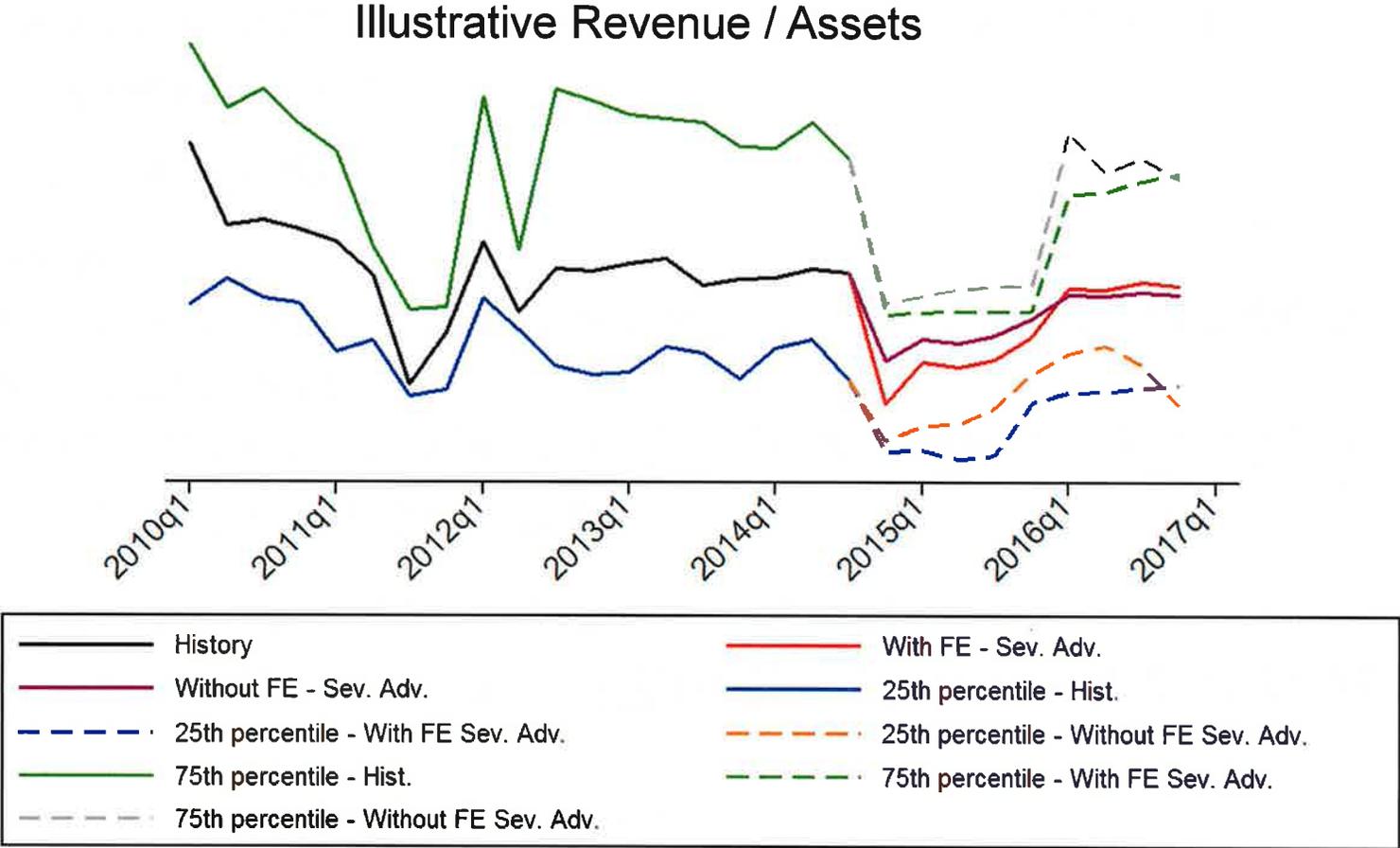
Fixed Effects Reduce Autoregressive Coefficient

- Recent performance has a smaller effect on forecast



PPNR Component Models with Fixed Effects

- Median effect is negative for industry, but variable for individual BHCs



Criteria for Evaluating Models

- Root mean squared error (RMSE) – How does a forecast perform, on average, relative to actual?
- In-sample and out-of-sample
 - In sample criteria are easy to calculate and program, but easy to overfit limited data
 - Finite number of out-of-sample tail realizations of macroeconomic variables
- Forecast horizon
 - Up to 9 quarters ahead
 - Models may perform misleadingly well over short horizons
- Out-of-sample 9Q is intuitively the right metric, but drops many observations in the crisis time period

Other Metrics

- Different subsets of forecast errors (in- and out-of-sample)
 - Macroeconomic environment: recession quarters, financial crisis quarters
 - Recent quarters
- Distribution of errors across firms
 - How does a model perform for 75 percentile firm or worst firm?
- “Stability”
 - Estimate model with data through time t and calculate forecast with constant starting point data (for example, beginning in 2010:Q1, 19 estimated model coefficients through 2014:Q3)
 - Calculate standard deviation of forecasts
- Sensitivity to macro scenarios
 - Compare forecasts of different scenarios

Using These Metrics to Inform Model Development

- Use differences between metrics to inform analysis and use judgment
- New models should outperform on multiple dimensions
 - Models should improve performance for most firms without decreasing performance for the worst firms
- Errors calculated for components of revenue and in aggregate