

Discussion of

**Are low interest rates firing back?
Interest rate risk in the banking book and bank
lending in a rising interest rate**

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Introduction

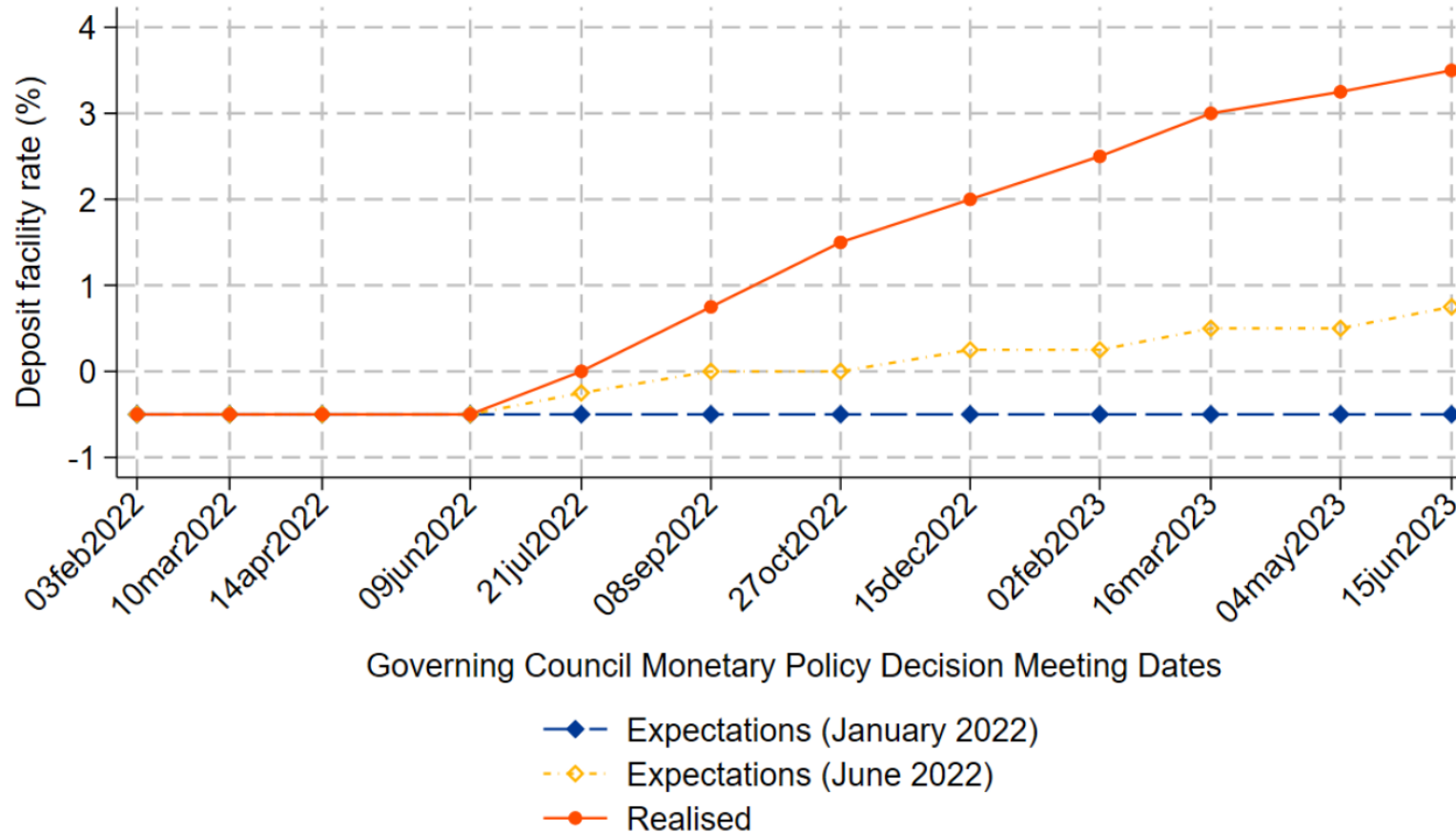
- Does banks' duration gap affect lending responses to rate increases?
 - **Yes.** But why?
- Empirical analysis
 - European Banks during 2021Q1 to 2023Q2
 - Exposure to interest rate risk of each bank – Duration –
 - On + off balance sheet assets and liabilities (nice)
 - Differential lending responses to rates hike
- Main evidence
 - **Lending of banks with higher duration tightens more**
 - This has effects on firms (no perfect substitutability)

My personal view

- Is the paper relevant and timely? Yes
 - Understand the way rate hikes are transmitted to the economy
- Nice database including not easy to include elements
 - E.g. off balance sheet items (maybe exploit them more)
- Some ideas that came to my head – Could we learn more?
 - Why does this happens? – Underlying mechanism -
 - How, what, why etc are banks allowed to assume very sticky non maturity deposits?

Just in case you had better things to do

- Low for long is over (at least for now)



→ But not necessarily its consequences

A brief reminder of duration

- Rate hikes can affect the value of an asset / liability
- Modified duration captures change in value due to rate hikes
 - Higher duration higher drop in value when rates increase
- The duration gap is duration assets – duration of liabilities

$$DurationGap = \sum_{j=1}^{14} \frac{DUR_j}{1+i} \left(\frac{A^j - L^j}{Z} \right)$$

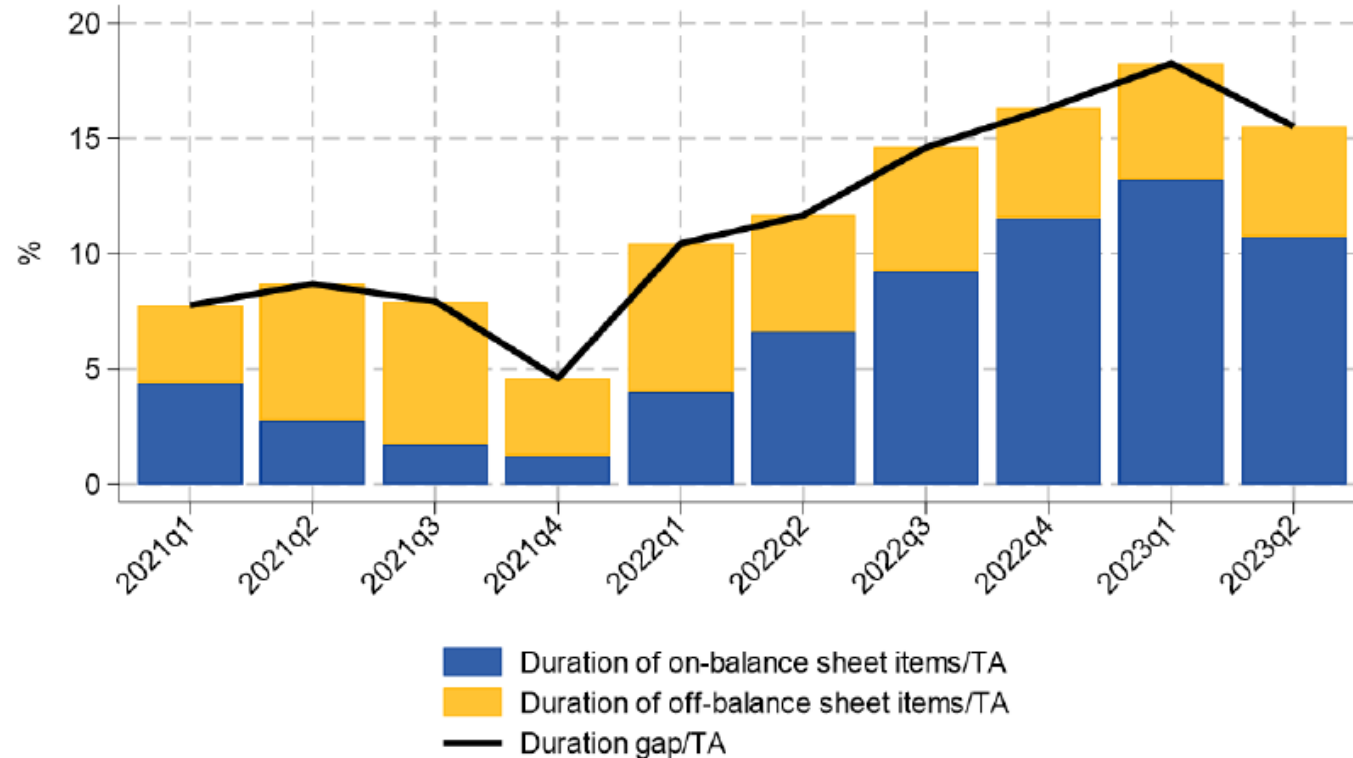
→ 3 year Maturity loans (+++) – 1 year term deposits (+) > 0

→ 1 year Maturity loan (+) – 3year term deposits (+++) < 0

A brief visual on duration

- There is on average a positive duration gap

→ Banks lend long term and borrow short term



→ Time variation seems to be driven by on balance sheet.

R1 Duration affects lending responses to MP

- Duration is related to differential lending responses to rate hikes

Table 3: Effects on the intensive margin

	<i>Dependent variable: $\Delta \text{Log}(\text{loans})$</i>				<i>new loan</i>	
	(1)	(2)	(3)	(4)	(1)	(2)
Duration gap/TA (lag)	0.000144 (1.24)	0.000193* (1.75)	0.000144 (1.22)	0.000194* (1.72)	0.000369*** (2.66)	0.000380** (2.42)
Duration gap/TA (lag) \times Δ policy rate	-0.0292** (-2.26)	-0.0300*** (-3.04)	-0.0294** (-2.25)	-0.0302*** (-3.00)	-0.0503** (-2.23)	-0.0603*** (-3.59)
Income gap/TA (lag)		-0.000460 (-1.61)		-0.000467 (-1.60)		-0.000657 (-1.09)
Income gap/TA (lag) \times Δ policy rate		0.0390* (1.75)		0.0395* (1.73)		0.0459 (0.95)
Log TA (lag)		0.00503** (2.11)		0.00507** (2.08)		0.00336 (0.90)
Log TA (lag) \times Δ policy rate		-0.422** (-2.16)		-0.413** (-2.07)		-1.025*** (-3.21)
Cash/TA (lag)		0.00150*** (3.19)		0.00151*** (3.22)		0.00312*** (3.52)

- Banks with higher duration gap cut lending relatively more
- Cheap comment: Can you do applications (for new loans –supply)?

R1.1 Effect is not homogeneous

- Higher response
 - For long maturity loans
 - For smaller firms

R1.2 Effect affects firms' borrowing

- Non perfect substitutability of bank finance
 - Firms more exposed to banks with duration suffer higher overall decline in borrowing (Q bank debt?)
 - Cheap comment: why not real effects?
 - Don't expect anything surprising but...

Comment 1 – What is driving the results?

- Duration is an equilibrium variable
 - Not correlated to many (any) bank variables
 - Is it related to low rates? (Not obvious to me from data)

Table 2: Regression of the duration gap on the set of control variables using bank-level data from the pre-tightening period.

	<i>Dependent variable: Duration gap/TA</i>							
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Income gap/TA	-0.610 (-1.32)	-0.309 (-0.63)						
Log TA	-2.588 (-1.07)		-1.350 (-0.63)					
Cash/TA	-0.401 (-0.76)			-0.0601 (-0.14)				
ROA	4.80 (0.72)				4.32 (0.68)			
Debt securities/TA	0.254 (0.64)					0.198 (0.73)		
NPL ratio	-1.33 (-0.62)						-0.794 (-0.43)	
Distance to MDA	-0.607 (-0.83)							-0.0549 (-0.11)
Observations	403	418	418	418	418	406	412	418

Note: ***, 0.01, **, 0.05, *, 0.1. Bank-level clustered standard errors are reported in parenthesis. For

Comment 1 – What is driving the results?

- Duration is an equilibrium variable
 - Not correlated to many variables
- What components of duration gap drive the results?
 - Is it off-balance sheet items? – They look stable over time-
 - Is it asset side duration?
 - What about deposit structure? Seems its not! (more later)
 - Suggestion: Decompose the gap to its elements
- But if its is not deposits, what is driving the result?
 - Are banks are subject to market based capital constraints?
 - Are banks subject to heightened regulatory scrutiny?

Comment 1 – What is driving the results?

- Might make sense to try and separate
 - Deposits run out which leads to contraction (seems its not)
 - Banks have market imposed capital requirements
 - Might want to check equity value responses...
 - Banks have to comply with some regulation
 - LCR, stress test, ... distance to CET is already accounted
 - Marginal income goes down quantities decrease (simpler)

Comment 1.1 – Positive and negative gap

- Commonly duration gap should be positive
 - Banks borrow short lend long (positive duration gap)
- However on the paper there are multiple negative duration gaps
 - Banks borrowing long and lending short!
 - Or maybe not... (more on this later)
- Are results symmetric on positive vs negative gap
 - Shouldn't some predictions on lending be opposite?
 - Positive-negative equity gain → lending increase-decrease
 - This might help to disentangle some stories from others
 - Dummy analysis is not enough I think

Comment 2 – Overnight deposit duration

- Only this probably deserves a (couple of) paper(s)
 - Overnight deposits have long maturities
- The contractual maturity of an overnight deposit is 1 day (I think)
 - However banks are allowed to state that they are sticky (...)
 - Which leads to banks having long maturity debt
 - This crucially affects the calculation of the duration gap
- What happens if you run the paper with contractual duration?
 - Maybe the negative gaps disappear...
 - Would help to learn what is driving the results ruling out the effect of deposit structure (C.1.)

Comment 3 – Overnight deposit duration

- Only this probably deserves a (couple of) paper(s)
 - Overnight deposits have long maturities
- Anyone knows why this (backward stickiness) is allowed?
 - I do not think it is theoretically sound – react to shocks-
 - Is it even empirically sound? I would say it is not (DSS'17)
 - This probably has effects for LCR NSFR stress-tests ...
- I would really appreciate if someone explains the rationale for this
 - Hopefully it is not that it benefits banks, or that it is the way it was done before... I know there is a rationale but cant find it!

Conclusion

- Nice and thought provoking paper on transmission of rate hikes
 - Duration gap is empirically relevant – convinced-
 - But why? Different plausible stories might be at work
- Looking forward to the next version
- Really looking forward to understand overnight long maturity!
 - not an assumption of this paper a reality in banking regulation