

CAUSAL INFERENCE FOR ASSET PRICING

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- equilibrium relations + fully specified models
- all about joint determination: factor models, Euler equations

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This paper: a causal inference framework that is compatible with finance ideas

OUTLINE

- 1 MAIN IDEAS THROUGH AN EXAMPLE
- 2 HOMOGENEOUS SUBSTITUTION CONDITIONAL ON OBSERVABLES
- 3 CROSS-SECTIONAL CAUSAL INFERENCE
- 4 ESTIMATING SUBSTITUTION
- 5 ESTIMATING MULTIPLIERS

AN EXAMPLE: CALPERS AND CORPORATE BONDS

- Prices have moved (no other news) and CalPERS adjusts its bond portfolio:

| | Initial position | Price change | New position |
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| 1. 10-yr Ford | 1,000 | + 5% | = 1,000 |
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- Naive approach: to get $D_i(P_i)$, relate position changes ΔD_i to price changes ΔP_i
- Portfolio choice:** holdings decided as a portfolio $\mathbf{D}(\mathbf{P})$
 - When price of First Solar increases, CalPERS sells some of it ... and likely, replaces by investing disproportionately more in other green bonds than brown bonds
 - Asset demand system:** How does demand i depends on price j :

$$\mathcal{E} = \left[\frac{\partial D_i}{\partial P_j} \right]_{ij}$$

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| \vdots | \vdots | \vdots | \vdots |

$$\Delta D_1 = \underbrace{\mathcal{E}_{11}\Delta P_1}_{\text{became more expensive}} + \underbrace{\mathcal{E}_{12}\Delta P_2}_{\text{substitutes from GM}} + \underbrace{\sum_{k \geq 3} \mathcal{E}_{1k}\Delta P_k}_{\text{substitutes from First Solar, ...}}$$

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$$\Delta D_2 = \mathcal{E}_{22}\Delta P_2 + \mathcal{E}_{21}\Delta P_1 + \sum_{k \geq 3} \mathcal{E}_{2k}\Delta P_k$$

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⋮

- Stuck without making assumptions

MAKING PROGRESS

- **Key identifying assumption: homogeneous substitution conditional on observables**
 - When CalPERS substitutes, does so differentially for bonds with different observables (e.g. greenness, duration), but does not distinguish between bonds with the same observables
 - E.g.: portfolio replacing First Solar has equal quantity of Ford and GM: $\mathcal{E}_{13} = \mathcal{E}_{23}$

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RELATIVE ELASTICITY

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How does the relative demand for 10-yr Ford and 10-yr GM respond to a change in their relative price?

$$\hat{\mathcal{E}} = \frac{\Delta D_1 - \Delta D_2}{\Delta P_2 - \Delta P_1} = \frac{0 - 100}{+5 - -5} = -10$$

RELATIVE ELASTICITY AND EXOGENOUS VARIATION (IV)

- Recover **relative elasticity**: How does the relative demand for two bonds with the same greenness and duration respond to a change in their relative price?

RELATIVE ELASTICITY AND EXOGENOUS VARIATION (IV)

- Recover **relative elasticity**: How does the relative demand for two bonds with the same greenness and duration respond to a change in their relative price?
- In practice, there are always other news
 - Shifts in demand curve ϵ : news about the assets, change in CalPERS financial health, ...

$$\Delta D = \mathcal{E} \Delta P + \epsilon$$

- Might correlate with prices (e.g. Ford price up because the new F150 is amazing)
 - Classic demand estimation challenge
- Solution: **instrument** that moves prices in uncorrelated way to ϵ
 - E.g.: Fed randomly buys more Ford than GM, ...
 - IV regression: compare changes in demand and changes in prices for all such pairs

WHAT IS MISSING?

Under our assumption:

1. **Cross-sectional causal inference** identifies the *relative elasticity* between assets with the same observables
2. Impossible to recover **substitution** between different observables with cross-section alone
3. **A small set of time series regressions** identifies **substitution** across observables
 - Intuition: look at portfolios based on observables, then focus on meso and macro elasticity
 - Meso: How does the demand for green bonds relative to brown bonds respond to the price of the green-minus-brown portfolio and the market portfolio?
 - Macro: How does the demand for bonds responds to the price of the market portfolio and the green-minus-brown portfolio?
 - Need simultaneous instruments over time for the price of all portfolios

RELATED LITERATURE

■ Asset pricing using causal inference methods

- Shleifer (1986); Harris, Gurel (1986); Chang, Hong, Liskovich (2014); Pavlova, Sikorskaya (2023); Greenwood, Sammon (2024); Gompers, Metrick (2001); Coval, Stafford (2007); Lou (2012); Ben-David, Li, Rossi, Song (2022); Hartzmark, Solomon (2022); Krishnamurthy, Vissing-Jorgensen (2011); Haddad, Moreira, Muir (2021, 2025); Selgrad (2024); Du, Tepper, Verdelhan (2018); Greenwood, Vissing-Jorgensen (2018); Haddad, Muir (2021); Chen, Chen, He, Liu, Xie (2023); ...

■ Structural approach and demand systems

- *Koijen, Yogo (2019, 2024); Koijen, Richmond, Yogo (2024); Haddad, Huebner, Loualiche (2024); van der Beck (2024); Lu, Wu (2023); Gabaix, Koijen (2024); Bretscher, Schmid, Sen, Sharma (2024); Jansen, Li, Schmid (2024); Fang (2023); Fang, Xiao (2024); ...*
- Li, Lin (2024); Chaudhary, Fu, Li (2023); Aghaee (2024); An, Huber (2025); Peng, Wang (2023); Fuchs, Fukuda, Neuhaus (2025); ...

■ What we don't do:

- Strategic responses (Haddad, Huebner, Loualiche, 2024)
- **Dynamics** (Greenwood, Hanson, Liao, 2018; An, 2024, Huebner, 2024; Gabaix, Koijen, 2024; Davis, Kargar, Li, 2025; **He, Kondor, Li, 2025**)
- State-contingent shocks (Haddad, Moreira, Muir, 2025)

■ Spillovers/substitution outside asset pricing:

- *Berry, Levinsohn, Pakes (1995), Berry, Haile (2014) ...*

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AN ASSUMPTION
FOR DEMAND IN ASSET PRICING

THE DEMAND FUNCTION FOR ASSETS

- Investor chooses portfolio ... taking prices are given: $D(P, \dots)$
 - Similar structure with market power or learning from prices: post a demand curve
- In changes, linearize:

$$\Delta D = \underset{\text{elasticity}}{\mathcal{E}} \Delta P + \underset{\text{shifts}}{\epsilon}$$

- could be logs, levels, portfolio weights, yields: flexibly chosen to give regularity to \mathcal{E}
 - Markowitz: $D = \frac{1}{\gamma} \Sigma^{-1} (\mu - P) \Rightarrow \mathcal{E} = \frac{1}{\gamma} \Sigma^{-1}$
- *Multipliers* or price impact: effect of demand shifts on equilibrium prices $\mathcal{M} = -\mathcal{E}_{agg}^{-1}$

Framework: what if you want to figure \mathcal{E} out from data without assuming much?

AN ELEMENTARY ASSUMPTION

A1. **Homogeneous substitution conditional on observables**

→ *Any pair of assets in the estimation sample \mathcal{S} with the same observables shares the same cross-price elasticity with respect to any third asset, within or outside the estimation sample:*

$$\boxed{\mathcal{E}_{il} = \mathcal{E}_{jl} \text{ if } X_i = X_j} \quad \text{for all } i, j \in \mathcal{S}, \text{ and } l \neq i, j,$$

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- When substituting, the investor differentiates with respect to X only
- X_i : $K \times 1$ vector of observables for asset i (e.g. greenness, duration)
- And, add **linearity** to handle continuous observables

$$\mathcal{E}_{il} = \mathcal{E}_{\text{cross}}(X_i, X_l) = X_i' \underbrace{\mathcal{E}_X}_{K \times K} X_l$$

- Can apply everywhere, or just to a sample of assets \mathcal{S}

REGULARIZING A BIT MORE

A2. Constant relative elasticity

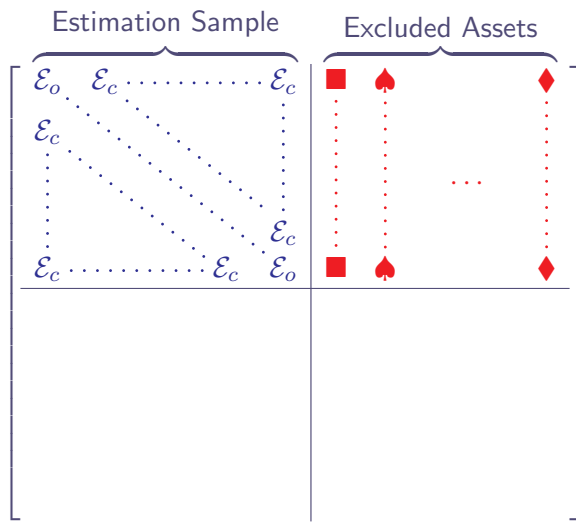
→ *Assets in the estimation sample have the same value of relative elasticity $\mathcal{E}_{relative}$ with respect to other assets with the same characteristics:*

$$\boxed{\mathcal{E}_{ii} - \mathcal{E}_{ji} = \mathcal{E}_{relative} \text{ if } X_i = X_j} \quad \text{for all } i, j \in \mathcal{S}$$

- How does the relative demand for two assets with the same observables respond to a change in their relative price?
 - ★ In our example, GM 10-year bonds to the price of Ford 10-year bonds
- Similar local behavior across assets → homogeneous treatment effect
- Can relax a lot for cross-sectional results (function of characteristics, LATE)

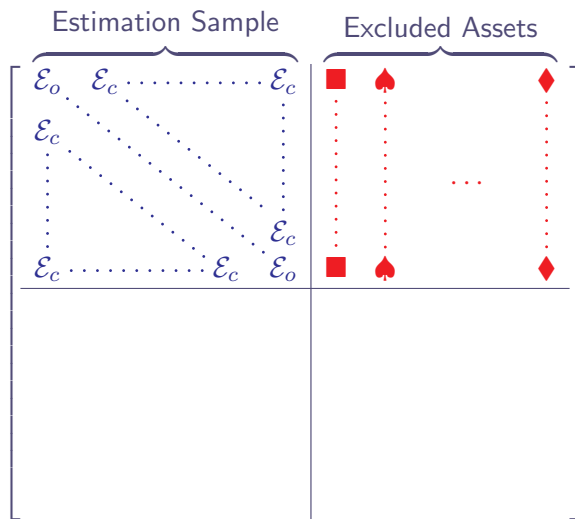
USING THE ASSUMPTIONS: LOCAL EXPERIMENTS

- With few close assets: ignore observables & assume full homogeneity
 - Demand for 10-yr bonds of Ford and GM responds in same way to price of 5-year First Solar bond



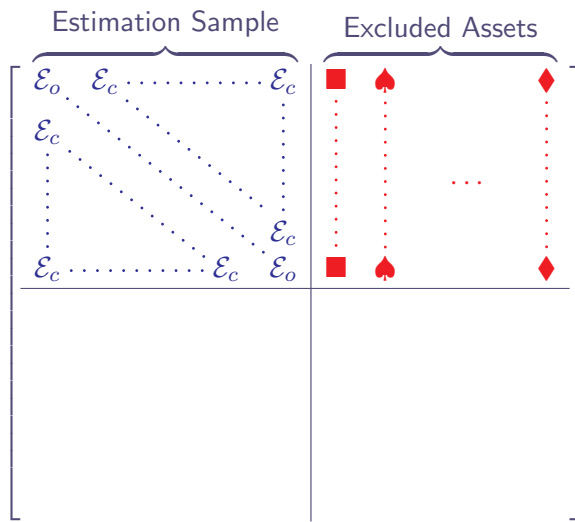
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- Risk-based models: assets with common variance/covariance + *identical covariance with outside assets*



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 - Demand for 10-yr bonds of Ford and GM responds in same way to price of 5-year First Solar bond
- Risk-based models: assets with common variance/covariance + *identical covariance with outside assets*
- Diagnostic: balance between treated (high Z_i) and control (low Z_i) on covariance with broad factors



USING THE ASSUMPTIONS: RICH CROSS-SECTIONS

Key question: What do investors consider when substituting between assets?

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This matters for what observables X_i to include

- *Broad categories:* X_i are group dummies say on durations or industries
- *Risk based motives:* care about portfolio-level factor exposure, so X_i are factor loadings or characteristics that proxy for them
- *Non-risk motives:* X_i is asset weight in this objective

$$\max_D \quad D'(M - P) - \frac{\gamma}{2} D' \Sigma D - \frac{\kappa}{2} \left(D' X^{(1)} \right)^2$$

such that $D' X^{(2)} \leq \Theta$

- Binding constraints (e.g. leverage)
- Manages a regulatory score (e.g. capital ratio,...)
- Stakeholders pressure (e.g. greenness, ...)

CROSS-SECTIONAL CAUSAL INFERENCE

CROSS-SECTIONAL IDENTIFICATION

- Data-Generating-Process: Elasticity matrix \mathcal{E} + CalPERS cares about greenness (X)

$$\Delta \mathbf{D} = \mathcal{E} \Delta \mathbf{P} + \epsilon$$

- Run an IV regression, with Z_i instrument for prices ($Z_i \perp \epsilon_i | X_i$)

$$\Delta D_i = \hat{\mathcal{E}} \Delta P_i + \theta' X_i + e_i$$

$$\Delta P_i = \lambda Z_i + \eta' X_i + u_i$$

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- **Proposition 1.** Under A1 & A2, and the usual exclusion and relevance restrictions, the IV estimator identifies the **relative elasticity** $\hat{\mathcal{E}} = \mathcal{E}_{relative} = \mathcal{E}_{ii} - \mathcal{E}_{ji}$ for $X_i = X_j$

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- In literature, some researchers switch the sides of P - D in regression, and find IV for ΔD
 - Commonly used in empirical asset pricing (exploiting fund flows)
 - Under A1 & A2 the identified coefficient is $-1/\hat{\mathcal{E}}$

GETTING RID OF SUBSTITUTION

- Key step: coefficient on observables θ absorbs substitution from other assets

$$\begin{aligned}\Delta D_i &= \mathcal{E}_{ii} \Delta P_i + \sum_{j \neq i} X_i' \mathcal{E}_X X_j \Delta P_j + \epsilon_i \\ &= (\mathcal{E}_{ii} - X_i' \mathcal{E}_X X_i) \Delta P_i + \sum_j X_i' \mathcal{E}_X X_j \Delta P_j + \epsilon_i \\ &= \underbrace{(\mathcal{E}_{ii} - X_i' \mathcal{E}_X X_i)}_{\text{relative elasticity}} \Delta P_i + X_i' \underbrace{\sum_j \mathcal{E}_X X_j \Delta P_j}_{\text{constant across assets, } \theta} + \epsilon_i\end{aligned}$$

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Absorbing substitution \neq Estimating substitution

- In cross-section, some aggregate variables do not change across assets
- "Missing intercept" (here, **coefficient** actually) problem: don't know how θ would change when prices change

WHAT ABOUT EQUILIBRIUM PRICE ADJUSTMENT?

In the data, there are always changes in price

- Just like in our model so there is no notion of “separately moving each price”
 - If the Fed doesn't buy a bond, its price might move as Fed bought its substitutes
- In standard demand system, prices can be off- or on-equilibrium

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Two important issues for applying IV methodology in our framework

- Equilibrium price adjustment per se is not an issue for exogeneity
 - **Exclusion restriction:** $Z_i \perp \epsilon_i | X_i$, that is, “Fed buying a bond or not” uncorrelated to *demand shifts* of CalPERS
 - In a dynamic setting, this could fail (Haddad, Moreira, Muir 2024; He Kondor, Li 2025)
- If equilibrium is such that the two prices cannot deviate *at all* from each other (so law of one price holds strictly), **Relevance** condition might fail
 - You can assess this empirically!

WHAT ABOUT LOGIT?

- Koijen Yogo (2019), Koijen Richmond Yogo (2024):
 - \exists factor models where volatility and expected returns depend non-linearly of prices which yield asset demand in the logit form
 - Logit has **non-zero** substitution and can be estimated from the cross-section alone

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- **An arbitrary factor model is not equivalent to logit**
 - Logit: when the price of any bond increases, CalPERS replaces it proportionally to its existing portfolio
 - Simple factor model: when the price of a bond increases, CalPERS replaces it disproportionately with bonds with similar factor loadings

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 - Logit: when the price of any bond increases, CalPERS replaces it proportionally to its existing portfolio
 - Simple factor model: when the price of a bond increases, CalPERS replaces it disproportionately with bonds with similar factor loadings
- All those models (with proper units) satisfy our assumptions and hence can have relative elasticity estimated from the cross-section
 - Imposing logit structure ($\mathcal{E}_{ij} \propto D_i \cdot D_j$) allows researchers back out substitution
 - To the extreme, if assuming no substitution, cross-section is enough for \mathcal{E}

ESTIMATING SUBSTITUTION WITH THE TIME SERIES

SUBSTITUTION AND ITS ESTIMATION

More interesting questions about how portfolio responds to prices:

- Will CalPERS maintain its green tilt if the price of green bonds become very expensive relative to red bonds? How much to size down?
- Answer to these questions relies on knowing substitution (across red and green assets)!

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High-level idea:

- $\mathcal{E} = \hat{\mathcal{E}}\mathbf{I}_N + X'\mathcal{E}_X X$ so we need to estimate \mathcal{E}_X which is $K \times K$
- Recall that

$$\Delta D_i = \underbrace{(\mathcal{E}_{ii} - X_i' \mathcal{E}_X X_i)}_{\text{relative elasticity, } \hat{\mathcal{E}}} \Delta P_i + X_i' \underbrace{\sum_j \mathcal{E}_X X_j \Delta P_j}_{\text{constant across assets but time-varying}} + \epsilon_i$$

- To estimate \mathcal{E}_X , construct X -based portfolio $X_j \Delta P_j$ and finding IV for it

SIMPLIFYING SUBSTITUTION

Under A1 & A2, replace the asset-level problem of substitution with a portfolio-level problem:

- Say X_i (which is normalized) captures greenness
- Re-package prices and demand:

$$\Delta P_{agg} = \frac{1}{N} \sum_i \Delta P_i,$$

$$\Delta D_{agg} = \frac{1}{N} \sum_i \Delta D_i$$

$$\Delta P_X = \frac{1}{N} \sum_i X_i \Delta P_i$$

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$$\Delta P_{idio,i} = \Delta P_i - \Delta P_{agg} - X_i \Delta P_X$$

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$$\Delta P_{idio,i} = \Delta P_i - \Delta P_{agg} - X_i \Delta P_X$$

$$\Delta D_{idio,i} = \Delta D_i - \Delta D_{agg} - X_i \Delta D_X$$

- *Decompose the response of demand to prices into three univariate components:*

Relative:

$$\Delta D_{idio,i} = \hat{\mathcal{E}} \Delta P_{idio,i}$$

Meso:

$$\Delta D_X = \tilde{\mathcal{E}}_{agg} \Delta P_{agg} + \tilde{\mathcal{E}}_X \Delta P_X$$

Macro:

$$\Delta D_{agg} = \bar{\mathcal{E}}_{agg} \Delta P_{agg} + \bar{\mathcal{E}}_X \Delta P_X$$

ESTIMATING THE MESO AND MACRO ELASTICITIES

Meso:

$$\Delta D_X = \tilde{\epsilon}_{agg} \Delta P_{agg} + \tilde{\epsilon}_X \Delta P_X$$

Macro:

$$\Delta D_{agg} = \bar{\epsilon}_{agg} \Delta P_{agg} + \bar{\epsilon}_X \Delta P_X$$

- Substitution boils down to relation between aggregate and observable based portfolios
 - Response of overall demand and green portfolio tilt to aggregate bond price and price of green-minus-brown portfolio (but low dimensional)
- Need joint instruments for prices **in time series**:
 - To estimate macro elasticity, need to account for simultaneous change in price of green-minus-brown
 - Only controlling for portfolio prices is generally a bad control (in particular if demand shocks are correlated)

(ATTEMPT) OF ESTIMATING MULTIPLIERS: AN EMPIRICAL EXAMPLE

EXAMPLE: CORPORATE BOND RELATIVE MULTIPLIER

- U.S. investment-grade corporate bonds (following Chaudhary Fu Li, 2024)
- Steps to go through when conducting causal inference in asset pricing:
 - 1 choose a source of variation
 - 2 assess exogeneity
 - 3 assess assumptions A1 and A2 and select observables + units
 - 4 implement the regression analysis
- Step 1: flow-induced demand shock Z_{it} : fund flow in mutual funds \times portfolio composition (Coval Stafford 2007, Lou 2012)
- Step 2: assess exogeneity, i.e., $Z_{it} \perp \epsilon_{it} | X_{it}$
 - example threat to identification: another investor type (e.g., insurance companies) buying the same bonds held by mutual funds that receive a lot of inflows

STEP 3: DIAGNOSTIC FOR A1 – BALANCE ON COVARIANCES

Do treated bonds comove the same way with broad portfolios as the control bonds?

- 1 At each date t , form a long-short portfolio based on whether Z_{it} is above (“treated”) or below (“control”) the median
- 2 Compute the β of the long-short return on broad indices in a window around t (here: 2y)
- 3 β different from zero \Rightarrow substitution likely not homogeneous

STEP 3: DIAGNOSTIC FOR A1 – BALANCE ON COVARIANCES

Do treated bonds comove the same way with broad portfolios as the control bonds?

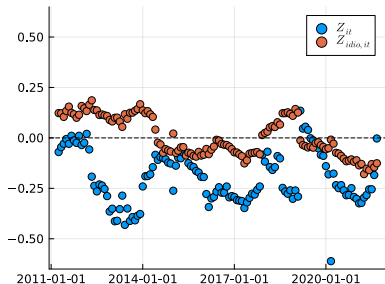
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-
- Treated and control bonds may differ systematically based on the observables, which may drive differences in β
 \rightarrow natural if investors choose their flows along dimensions like duration and credit risk
 - Do the treated and control comove the same way *conditional on observables*?
 - $Z_{idio,it}$: residual of instrument regressed on a date fixed effect, **duration** \times date fixed effects and **credit rating** \times date fixed effects

STEP 3: DIAGNOSTIC FOR A1 – BALANCE ON COVARIANCES

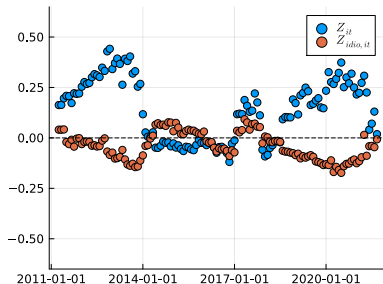
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 - $Z_{idio,it}$: residual of instrument regressed on a date fixed effect, **duration** \times date fixed effects and **credit rating** \times date fixed effects
 - Alternative unit to bond returns: yield changes ▶ A1 yield changes ▶ Multiplier yield changes
 - Similar diagnostic for A2: balance on idiosyncratic volatility ▶ A2 diagnostic

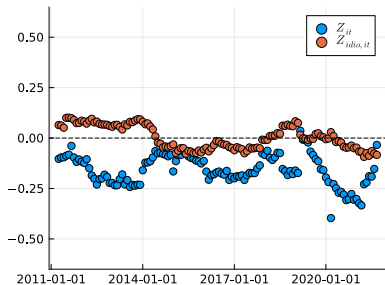
A. Corporate Bond Index



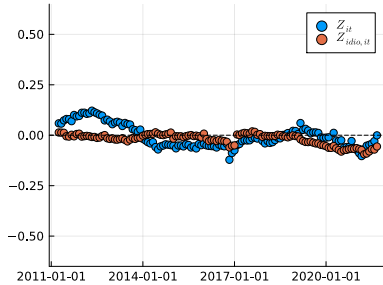
B. High—Low Credit Rating



C. Long—Short Term Bonds



D. Stock Index



STEP 4: IMPLEMENT THE REGRESSION

Relative multiplier $\widehat{\mathcal{M}} \approx 0$

| | Return $\Delta P_{it}/P_{i,t-1}$ | | | | |
|---|----------------------------------|---------|---------|---------|---------|
| | (1) | (2) | (3) | (4) | (5) |
| <i>Demand shock:</i> | | | | | |
| Z_{it} | 1.541* | -0.254 | 0.019 | | |
| | (0.637) | (0.229) | (0.065) | | |
| $Z_{idio,it}$ | | | | 0.019 | 0.019 |
| | | | | (0.065) | (0.065) |
| Date Fixed Effects | | Yes | Yes | Yes | Yes |
| Duration \times Date Fixed Effects | | | Yes | Yes | |
| Credit Rating \times Date Fixed Effects | | | Yes | Yes | |
| N | 646,335 | 646,335 | 646,335 | 646,335 | 646,335 |
| R^2 | 0.010 | 0.415 | 0.632 | 0.632 | 0.415 |

EXTRA STEP: MESO- AND MACRO MULTIPLIERS

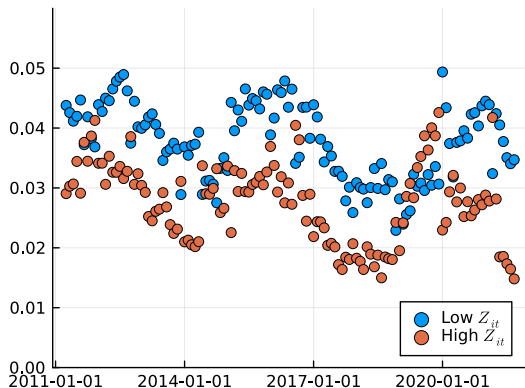
| | Return $\Delta P_{agg,t}/P_{agg,t-1}$ | | Return $\Delta P_{X,t}/P_{X,t-1}$ | Return $\Delta P_{it}/P_{i,t-1}$ | |
|---------------------------|---------------------------------------|---------------------|-----------------------------------|----------------------------------|---------------------|
| | (1) | (2) | (3) | (4) | (5) |
| $Z_{agg,t}$ | 14.231*** (3.643) | 12.347** (3.985) | 7.294** (2.423) | 12.347** (3.959) | 12.347** (3.958) |
| $Z_{X,t}$ | | -6.170 (7.810) | 0.817 (4.591) | -6.170 (7.757) | -6.170 (7.757) |
| $Z_{agg,t} \times X_{it}$ | | | | | 7.294** (2.407) |
| $Z_{X,t} \times X_{it}$ | | | | | 0.817 (4.558) |
| $Z_{idio,it}$ | | | | 0.090 (0.055) | 0.090 (0.054) |
| Duration X_{it} | | | | 0.001 (0.001) | -0.001 (0.001) |
| N | 150 | 150 | 150 | 646,335 | 646,335 |
| R^2 | 0.242 | 0.250 | 0.135 | 0.101 | 0.125 |

CONCLUSION

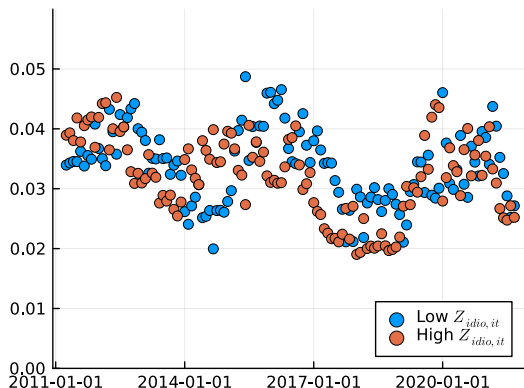
- Key challenge for causal inference in asset pricing: substitution across assets
- **An elementary condition for valid inference:** homogenous substitution conditional on observables
 - difference in substitution driven by a known set of observables
- **Standard cross-sectional causal inference** identifies relative elasticity or its inverse, relative multiplier
 - Guidance on designing settings such that assumptions are plausible
 - Compatible with usual covariance matrix assumptions
- **Time series identification with observable-based portfolios** reveals substitution
 - Need to consider all dimensions of substitution jointly

DIAGNOSTICS FOR A2 – BALANCE ON IDIOSYNCRATIC VOLATILITY

A. Idiosyncratic Volatility (Z_{it})

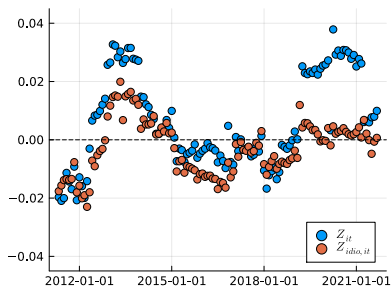


B. Idiosyncratic Volatility ($Z_{idio,it}$)

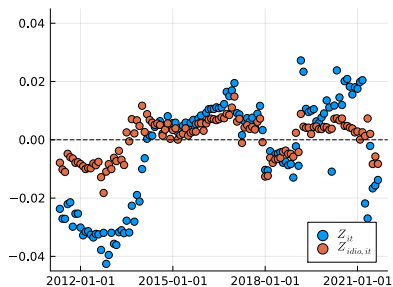


■ Average idiosyncratic volatility among treated versus control bonds

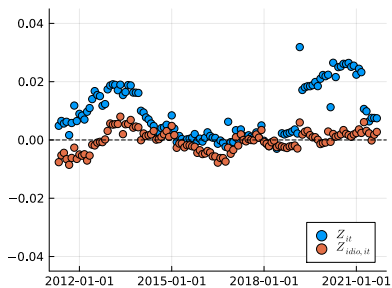
A. Corporate Bond Index



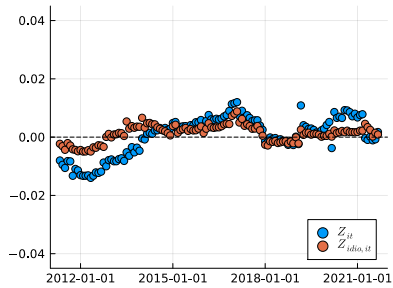
B. High—Low Credit Rating



C. Long—Short Term Bonds



D. Stock Index



Relative multiplier $\widehat{\mathcal{M}} = -0.072$

| | Yield change ΔY_{it} | | | | |
|---|------------------------------|---------|----------|----------|----------|
| | (1) | (2) | (3) | (4) | (5) |
| <i>Demand shock:</i> | | | | | |
| Z_{it} | -0.384* | -0.104* | -0.072** | | |
| | (0.166) | (0.047) | (0.027) | | |
| $Z_{idio,it}$ | | | | -0.072** | -0.072** |
| | | | | (0.027) | (0.027) |
| Date Fixed Effects | | Yes | Yes | Yes | Yes |
| Duration \times Date Fixed Effects | | | Yes | Yes | |
| Credit Rating \times Date Fixed Effects | | | Yes | Yes | |
| N | 630,255 | 630,255 | 630,255 | 630,255 | 630,255 |
| R^2 | 0.004 | 0.071 | 0.089 | 0.089 | 0.070 |

ASSET DEMAND SYSTEM WITH LOGIT FORM VS OUR PAPER

- In Koijen Yogo 2019, Mean-variance optimization + factor structure + **certain assumptions** (especially on the share of outside asset) \Rightarrow

$$D_i = w(p_i, x_i, \mathbf{p}, \mathbf{x}) = \frac{\exp(-\alpha p_i + \beta' x_i)}{1 + \sum_l \exp(-\alpha p_l + \beta' x_l)}$$

- The key substitution pattern of logit system is

$$\mathcal{E}_{ij} = \frac{dD_i}{dp_j} = \frac{\exp(-\alpha p_i + \beta' x_i) \cdot \alpha \exp(-\alpha p_j + \beta' x_j)}{(1 + \sum_l \exp(-\alpha p_l + \beta' x_l))^2} = \alpha D_i D_j$$

- Implied substitution matrix $\mathcal{E}_{sub} = \alpha D D'$, with Rank 1
 - Any non-linear transformation of D will not affect the rank of this matrix
- In our setting, this substitution matrix has a rank K

$$\mathcal{E}_{sub} = [X'_i \mathcal{E}_X X_j] = \underbrace{X'}_{N \times K} \underbrace{\mathcal{E}_X}_{K \times K} \underbrace{X}_{K \times N}$$