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# Flow Trading

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## Abstract

We propose a new market design for trading financial assets. The design has three elements: (1) traders may place orders for any user-defined linear combination of assets, with arbitrary positive and negative weights; (2) orders are downward-sloping piecewise-linear demand curves with quantities expressed as flows; (3) markets clear jointly for all assets in discrete time using batch auctions. Market-clearing prices and quantities are shown to exist, with the latter unique, despite the wide variety of preferences that can be expressed. Calculating prices and quantities is shown to be computationally feasible using an interior point method to solve a quadratic program. Microfoundations for our approach to trading portfolios are provided using a CARA-normal framework. The proposal has several advantages over the status quo market design, arising from the novel approach to trading portfolios and the combination of discrete time and continuous prices and quantities (the status quo has these reversed).

**Keywords:** market design, financial exchanges, portfolios, computation

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# 1 Introduction

Portfolios and arbitrage are at the heart of finance. It has been understood all the way back to the development of the capital asset pricing model and arbitrage theory in the 1950s and 1960s that any one market participant's demand for any asset depends on prices of other assets (Markowitz (1952), Tobin (1958), Sharpe (1964), Lintner (1965), Fama (1970), Ross (1976)).<sup>1</sup> Yet, financial exchanges for trading equities and many other assets—such as futures, options, and government debt—use a market design in which each individual asset trades in its own separate limit order book. If one stops to think about it, this is at least somewhat puzzling. With limited exceptions, financial markets around the world clear one asset at a time.

One factor is that designing a market to simultaneously trade and price large numbers of assets is hard. There are two major difficulties. First, if there is just a single asset then market clearing is trivial, whether via a limit order book or a uniform-price batch auction. But, as soon as there are multiple assets, there is the question of whether market-clearing prices exist. With trading of multiple goods, especially if there are complementarities—and portfolios and arbitrage can represent a form of complementary demand across assets—it is well known that prices that clear the market do not always exist. The second issue is computation. Computing the market-clearing price in an auction market with a single asset is trivial, as is running a limit order book market for a single asset. But, as soon as there are multiple goods for which market-clearing prices need to be computed jointly, computation often becomes a difficult or intractable issue, even if prices are known to exist. This has been understood by economists dating back at least to Scarf and Hansen (1973), and computational considerations have played a prominent role in the design of modern combinatorial auction formats (e.g., Milgrom and Segal (2017), Leyton-Brown, Milgrom, and Segal (2017)).

Another factor, of course, is path-dependence. The predominant market design used around the world today, the continuous-time limit order book, traces not only to the era of specialists and trading pits in the latter half of the 20th century, but all the way back to trading under the buttonwood tree in the 18th century. A human can run a limit

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<sup>1</sup>In market design theory, combinatorial markets, in which prices for multiple assets are discovered jointly, have been a central topic of research since the 1990s (see, e.g., Roth (2002), Klemperer (2004), Milgrom (2004), Cramton, Shoham, and Steinberg (2006)).

order book market for individual assets with pen and paper or simple electronic record-keeping if the orders arrive slowly enough. Modern computers can run limit order book markets at modern speeds and order volumes. While this market design has been a remarkably successful and enduring market institution from a broad historical perspective, it has important weaknesses that we and others have analyzed in prior work and will discuss more soon.

This paper proposes a new financial market design in which market participants can directly trade portfolios of assets. A portfolio in our design is *any user-defined linear combination of assets*, where portfolio weights can take on arbitrary positive or negative values. For example, one can trade an index portfolio, or a customized portfolio, or engage in a pairs trade, or engage in any customized long-short trading strategy. We develop a novel design for trading such flexible portfolios in a way that guarantees existence of market-clearing prices and has attractive computational performance.

The proposal incorporates two other ingredients from our prior work, which together enable the novel approach to trading portfolios. First is the idea of frequent batch auctions from Budish, Cramton, and Shim (2015). In order to trade multiple assets at the same time it is necessary for there to be a coherent notion of “same time”—and for this, one needs to make time a discrete variable and process requests to trade in batch, not serially. Second is the idea of continuous-scaled limit orders from Kyle and Lee (2017). Instead of trading portfolios all at once, with demand expressed via step functions, market participants trade gradually, specifying a maximum rate of trade and upper and lower limit prices, with piecewise-linear downward-sloping demand linearly interpolated between. For example, instead of “Buy 1000 units of Portfolio XYZ if the weighted portfolio price is \$500.00 or better,” an order might be “Buy up to 10 units per batch interval of Portfolio XYZ if the weighted portfolio price is \$500.00 or better, declining to 0 units per batch interval if the price is \$501.00 or worse, until up to 1000 units in total are bought.” This downward-sloping demand is necessary to ensure existence of market-clearing prices and fast computation.

While orders can be for arbitrary portfolios, the prices that are discovered are item prices, not bundle prices—that is, there is one market-clearing price per asset. This is critical. There are infinitely many possible portfolios. The proposal does not require an unrealistic coincidence-of-wants in which the buyer of a given portfolio must find sellers

of exactly that portfolio. Rather, a buyer of, say, a portfolio consisting of AAPL, GOOG and MSFT in some user-specified ratio might end up being matched against sellers of individual assets (e.g., AAPL), sellers of a subset of the portfolio (e.g., AAPL and MSFT), or even traders of portfolios that overlap in some partial way (e.g., a sell GOOG buy AMZN pairs trade). Market prices of portfolios are then calculated using the asset prices and portfolio weights.

Table 1 contrasts our proposed market design, which we call “Flow Trading,” against the traditional limit order book exchange design. In sum, relative to the status quo, the proposed market design makes time discrete instead of continuous, makes prices and quantities continuous instead of discrete, and allows participants to directly trade arbitrary user-defined portfolios of assets.

Flow Trading	Traditional Exchange
Downward-sloping piecewise-linear demand curves for flows	Discontinuous step functions for discrete quantities
Batch auctions in discrete time	Sequential matching one at a time
Orders for portfolios	Orders for individual assets

Table 1: Comparison of Flow Trading with the Status Quo Design

**Benefits** The proposed market design has several sets of benefits. First, it inherits the benefits of Budish, Cramton, and Shim (2015)’s and Kyle and Lee (2017)’s prior market design proposals. From Budish, Cramton, and Shim (2015), it addresses latency arbitrage and the arms race for trading speed. This improves liquidity and social welfare.<sup>2</sup> From Kyle and Lee (2017), it builds the ability to trade gradually directly into the market design, which is what large investors want to do practically and what many models suggest investors should do theoretically (Black (1971), Kyle (1985), Vayanos (1999)). This

<sup>2</sup>Recent empirical evidence from the UK stock market finds that latency arbitrage races constitute 20% of all trading volume and from 17% to 33% of the market’s cost of liquidity depending on the measure used (Aquilina, Budish, and O’Neill (2022)). Recent empirical evidence from the Taiwan stock market’s switch to continuous trading, away from five-second batch auctions, finds that continuous trading increases adverse selection by 36%, increases effective spreads by 5%, and reduces quoted depth by 3% (Indriawan, Pascual, and Shkilko (2022)).

saves significant costs related to the complex, expensive trading platforms institutional investors must use to manage their orders.<sup>3</sup>

Additionally, by combining Budish, Cramton, and Shim (2015) and Kyle and Lee (2017), we are able to have discrete time and continuous prices and quantities—tiny fractions of shares can trade each second within a nearly continuous price grid. For example, quantities could be expressed in nano-shares (billionths of shares) and prices in micro-dollars (millionths of dollars). In the status quo market design with trading in continuous time, making prices and quantities approximately continuous would cause an explosion of message traffic, with traders constantly canceling and replacing numerous small orders to improve their queue position. In our proposed design, prices and quantities can be approximately continuous without issue. This in turn addresses many complexities and inefficiencies caused by tick-size constraints in modern markets.<sup>4</sup> More speculatively, it seems likely that tick-size constraints and latency arbitrage together play a meaningful role in the proliferation of off-exchange trading in modern markets—which is now nearly 50% of equity volume in the United States.<sup>5</sup>

The main novel benefit of the market design is that it enables market participants to directly trade portfolios and engage in arbitrage strategies. We expect future research will help quantify the value of these innovations. One figure that suggests the value of trading portfolios may be high is the size of the market for exchange traded funds (ETFs). ETFs are redundant assets that enable investors to trade sponsor-defined portfolios efficiently, in exchange for a management fee on holdings that averages about 20 basis points. ETFs now constitute a remarkable 40% of all U.S. stock market volume.<sup>6</sup>

Another piece of suggestive evidence that the stakes are large is the size of the industry that has been built around fast arbitrage and short-horizon predictive analytics.

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<sup>3</sup>One recent article reported that institutional investor trading commissions were \$9bn in 2021 in U.S. equity markets alone (Bloomberg Insights (2021)).

<sup>4</sup>Tick-size constraints have been shown to lead to (i) high-frequency trading races for queue position, (ii) a proliferation of complex order types to navigate this race for queue position, and (iii) the proliferation of exchanges with creative fee schedules designed to circumvent this constraint. See the series of papers Chao, Yao, and Ye (2017, 2019), Yao and Ye (2018), Li, Wang, and Ye (2021), and additional references contained therein.

<sup>5</sup>Data on the share of off-exchange trading is available from SIFMA and was cited in Sept 2021 Senate testimony by SEC Chair Gary Gensler (available at <https://www.sec.gov/news/testimony/gensler-2021-09-14>).

<sup>6</sup>ETF volume is computed from CRSP (ETFs are share code 73). The 40% figure is ETFs' proportion of on-exchange trading volume in dollars. Vanguard reports that the asset-weighted average ETF expense ratio for non-Vanguard ETFs is 24 basis points in 2020.

Our proposed design builds the ability to engage in certain kinds of arbitrage directly into the market design—e.g., buy A and sell B, where A and B are highly correlated assets or portfolios of assets. This should reduce some of the economic rent and inefficiency associated with arbitraging the pricing relationship of A and B. For instance, in our market design, if A and B are perfect substitutes with an exact arbitrage pricing relationship, market participants can directly engage in Bertrand-like competition on the price for keeping A and B in their arbitrage relationship, using “Buy A, Sell B” and “Sell A, Buy B” pairs trades (indeed, the latter is just an offer to sell the former). There need not be any “correlation breakdown” of prices between A and B, as defined and documented in Budish, Cramton, and Shim (2015). This kind of competition is not possible in the status quo.

Last, the new market design significantly improves transparency and fairness. All orders that are executable at the market-clearing prices are executed, either at their full rate or at a partial rate depending on the order’s pricing parameters, and all orders that execute for a given asset receive the same pricing for that asset. This feature allows every trader, whether trading 100 shares or 100,000, to infer the exact sequence of prices and quantities executed on their order from publicly announced market-clearing prices. An institutional investor trading a sophisticated portfolio can confirm they received the correct execution. A retail investor trading a small amount can confirm they received the market-clearing price. These abilities perhaps do not sound radical, but they are a significant transparency improvement over the current market design, where checking whether one’s order received appropriate execution is difficult (see Tyc (2014)).

Having mentioned these potential benefits, we add an important caveat, which is that flow trading is not designed to mitigate market failures related to market power or private information (see Rostek and Yoon (2020) for a recent survey of these issues). Market participants still must think strategically about how to trade on private information and manage their price impact, just as in the status quo design. Flow trading removes some of the unnecessary technological costs and complexities surrounding this game, but the fact remains that large trades will move prices.

**Technical Foundations** We provide three sets of technical results: on existence and uniqueness of market-clearing prices and quantities; on computability of these prices and quantities; and results that provide microfoundations for the bidding language.

To prove existence of market-clearing prices and quantities, we transform the problem into a well-understood quadratic optimization problem with linear constraints. To do so, we first impute a quasi-linear quadratic utility function to each order by interpreting the order as an expression of preferences defining a linear marginal utility curve over the range where it is partially executable. The sum of these utility functions creates a concave objective function. The restrictions that each order must execute at a rate between zero and its maximum (e.g., one portfolio unit per batch auction) are linear inequality constraints. Market clearing defines linear equality constraints for each asset. Zero trade is feasible since it satisfies both sets of constraints. This setup allows us to use known results from convex optimization to prove existence of unique market-clearing quantities.

Market-clearing prices are Lagrange multipliers of the primal problem. Regardless of whether assets are complements or substitutes,<sup>7</sup> market-clearing prices exist because our language imposes downward-sloping demand curves on all user-defined portfolios. (We discuss the connection to other existence and non-existence results in Section 2.2.) Prices, however, may be non-unique when there are no partially executable orders from which unique prices can be inferred. For example, when there is only one order to buy or sell some asset, the market-clearing quantity must be zero, but any price at which the order is non-executable clears the market. Prices can easily be made unique by introducing a tie-breaking rule.

To show computational feasibility of the market design, we start by showing our problem has a structure such that the gradient method (equivalent to Walrasian tatonnement) is guaranteed to converge. This proves that our problem is computationally simpler than some cases of finding competitive equilibrium prices (Scarf and Hansen (1973)), as the reader will anticipate from the quadratic-programming setup described just above. It is well known, however, that the gradient method may be slow and inaccurate for problems with this structure. We therefore add to the market design that the exchange itself can serve as a “market maker of last resort.” Formally, the exchange is willing to buy or sell an epsilon amount of any asset at the market-clearing prices. This

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<sup>7</sup>In our context, if two assets in a portfolio have weights with the same sign, the assets are complements in the usual sense that an increase in the price of one asset decreases the quantity demanded of the other (or increases the quantity supplied). If two assets have portfolio weights with opposite signs, the assets are substitutes because an increase in the price of one asset increases the quantity demanded of the other (or decreases the quantity supplied).

allows us to use interior point methods, which are much faster and more accurate than the gradient method. Without the exchange as market maker, we know that zero trade is feasible but it is not strictly on the interior of the constraint set; with the exchange as market maker, we can easily find a feasible point strictly on the interior, from which the algorithm can be initialized. The exchange trading also ensures that market-clearing prices are unique.

We provide computational proof-of-concept by calculating market-clearing prices for a simulated order book using our own implementation of a public-domain interior-point method on an ordinary workstation. In a market with 500 assets and 100,000 orders, our algorithm calculates prices in about 0.15 seconds in the base-case scenario (with the computation time ranging from 0.12 to 0.27 seconds when we consider a wide range of parameter values). With 500 assets and 1,000,000 orders, computation time is about 0.56 seconds. With 2000 assets and 100,000 orders, the computation time is about 1.1 seconds. The simulation environment purposefully tries to make the problem difficult. Conceptually, our goalpost for the computational exercise is to suggest that serious computing power can solve a practical problem of realistic size in less than one second, not just to illustrate that the solution to the problem is in P and not NP.

We provide a stylized microfoundation for our approach to trading portfolios. In flow trading, an order specifies demand per batch auction in units of a user-specified portfolio as a piecewise-linear downward-sloping function of the portfolio's price. Although this language is more general than standard limit orders, it is still restrictive. In a CARA-normal framework (where investors have exponential utility or constant absolute risk aversion and subjective beliefs that liquidation values are normally distributed), the optimal demand for each asset is a linear function of the asset's own price and the prices of all other assets. Such demands cannot be implemented with standard limit orders due to the dependence of demand on prices of other assets. We show that, by rotating the assets in a specific manner, a trader's optimal demand can be expressed as a demand for a set of portfolios, such that their demand for each portfolio is a downward-sloping and linear function of the portfolio's price, consistent with our proposal. Moreover, if the trader believes that assets have a factor structure of rank  $K$ , they can implement the optimum with only  $K$  orders, which may be practically appealing.

The approach generalizes to taking account of linear price impact under the mild

assumption that the price impact matrix is positive semidefinite. The economic interpretation is that the market's implied supply curve for any portfolio slopes upward. The logic also extends to any strictly concave, twice continuously differentiable quasi-linear preference, as optimal demands can be locally linearly approximated with combinations of downward-sloping demand curves for portfolios. With wealth effects or learning from prices, however, demand curves may slope upward. Such demands cannot be expressed in our language because we require demand curves to be downward sloping.

**Structure of the paper** The rest of the paper is structured as follows. Section 2 discusses related literature. Section 3 describes the orders used for flow trading, which we call “flow orders.” Section 4 analyzes the existence and uniqueness of market-clearing prices and quantities. Section 5 shows computational feasibility of our proposal. Section 6 provides a microfoundation for our approach to trading portfolios. Section 7 concludes.

Additionally, Appendix A provides informal discussion of several important practical implementation and policy issues.

## **2 Related Literature**

We divide our discussion of related literature into two parts. Section 2.1 discusses the prior work related to the flow trading market design. Section 2.2 discusses prior work that is related to the results that market-clearing prices and quantities exist.

### **2.1 Literature Related to the Proposed Market Design**

The conceptual ideas behind this paper's market design proposal—piecewise-linear downward-sloping demand curves, portfolios as linear combinations of assets, arbitrage, general equilibrium theory, quadratic programming, batch auctions, reducing temporary price impact by trading slowly—are well-understood by researchers in economics and finance. Our contribution is to combine these ideas into a coherent and practical market design for trading financial assets such as stocks, bonds, and futures contracts.

The two prior works most closely related to our paper are Kyle and Lee (2017) and Budish, Cramton, and Shim (2015). Kyle and Lee (2017) propose downward-sloping,

piecewise-linear flow orders for individual assets (“continuously scaled limit orders”). Budish, Cramton, and Shim (2015) propose frequent batch auctions as a market design for financial exchanges. Combining these two market design ideas yields a market design for financial assets in which time is discrete instead of continuous, and prices and quantities are continuous instead of discrete. This is appealing for many reasons described above. Put another way, the present paper shows that these two prior market design ideas are complements, not substitutes.

The third ingredient of the market design proposal, directly trading portfolios, is novel to this paper. To be more precise, the broad idea of bidding for financial portfolios instead of individual assets is obvious from the combinatorial auctions literature, but our specific approach to trading portfolios, including both the bidding language and the associated existence and computability results, is novel. We suggest via a long list of example use cases that our proposed language is practically useful for real-world financial markets. Different ways of representing preferences for portfolios also might not yield the existence and computability results we obtain here.

Sophisticated expression of preferences over multiple objects is a theme in the market design literature more broadly. Research on this topic has straddled computer science, economics, and operations research (Lahaie and Parkes (2004), Sandholm and Boutilier (2006), Milgrom (2009), Klemperer (2010), Vohra (2011), Bichler (2017), Cramton (2017), Budish, Cachon, Kessler, and Othman (2017), Parkes and Seuken (2018), Budish and Kessler (2022)). This literature has focused on indivisible-goods combinatorial allocation problems, such as spectrum auctions. Relative to this burgeoning literature, our contribution is the proposed approach to trading portfolios, which treats all goods as perfectly divisible, and allows complementarities and substitutabilities only to the extent that they can be expressed with linear portfolio weights. This language is simple enough to obtain strong existence and computational results, while being expressive enough to capture many important use cases in financial markets.

Another closely-related body of work by Li, Wang, and Ye (2021), Chao, Yao, and Ye (2019), Chao, Yao, and Ye (2017), and Yao and Ye (2018) highlights the complexities created by tick-size constraints in modern markets and associates tick-size constraints with an important aspect of high-frequency trading, the race for queue position. As emphasized, our market design makes time discrete and prices continuous, thus eliminating

the inefficiencies caused by tick-size constraints.

The idea that optimal trading strategies involve flow trading to reduce temporary price impact costs emerges as an equilibrium result in game-theoretic models of rationally-optimizing strategic traders. Black (1971) conjectures that more urgent execution of large orders incurs greater price impact costs. Consistent with Black's conjecture, Kyle, Obizhaeva, and Wang (2018) describe an equilibrium in which all traders optimally submit linear demand curves for flow quantities, with endogenous urgency to profit from private information, in a continuous-time model. For discrete-time models, Vayanos (1999) and Du and Zhu (2017) describe equilibria in which all traders optimally submit linear demand curves to batch auctions, with endogenous urgency motivated by private values or endowment shocks.

A growing literature studies the implications of allowing orders to trade one asset to be contingent not only on the asset's price but also on the prices of other assets (Cespa (2004), Rostek and Yoon (2021), Rostek and Yoon (2022), Wittwer (2021)). For example, Rostek and Yoon (2021) study strategic behavior in a market with multiple assets and imperfectly competitive traders, under market designs with both contingent and non-contingent orders. In their framework, contingent orders allow a trader's demand for one asset to be a function of the price of all other assets, whereas non-contingent orders require that a trader's demand for each asset is a function only of the price of that asset. Our approach to trading portfolios is an intermediate case between contingent and non-contingent orders. A trader's demand for one asset can depend contingently on the prices of other assets, but only through these other asset prices' effects on the price of the trader-defined portfolio the assets belong to. In Section 6, we show that traders can implement their optimal fully-contingent demand by using a collection of our flow portfolio demands, which depend on the portfolio prices only.

Surprisingly, in these models, which study a one-shot Walrasian auctioneer framework, the efficiency and welfare consequences of allowing for contingent demands are ambiguous. Each trader's individually optimal demand is indeed contingent on all asset prices, but allowing for contingent orders affects incentives to strategically shade demand and supply, and the net effects of this incremental strategic behavior can affect efficiency or welfare in either direction. Chen and Duffie (2021) provide a related insight

by studying fragmentation of trade of the same asset across multiple trading venues.<sup>8</sup> We note that these analyses do not study the efficiency issues which motivate this paper's market design proposal, such as reducing the technology and intermediation costs of trading portfolios (in these models, trading, including complex trading, is free) or reducing latency arbitrage opportunities across venues (in these models there is mostly just a single trading period).

## 2.2 Literature Related to Existence Results

We obtain existence of market-clearing prices and quantities despite the wide range of preferences, including both substitutes and complements, that can be expressed using portfolio orders. In this subsection we describe the relationship of our existence results to the textbook general equilibrium theory approach and to the literature on indivisible goods.

**Relationship to General Equilibrium Theory** Readers familiar with the standard treatment of general equilibrium theory will notice differences in our approach to existence and uniqueness. Mas-Colell, Whinston, and Green (1995, Chapter 17) ("MWG") is a reference for the standard treatment, descending from Arrow and Debreu (1954) and McKenzie (1959). This standard approach uses fixed-point theorems to derive existence results for general convex preferences which include income effects. Finding the fixed point is known to often be computationally intractable (Scarf and Hansen (1973), Daskalakis, Goldberg, and Papadimitriou (2009), Budish, Cachon, Kessler, and Othman (2017)). By contrast, our market design approach focuses on a language for preferences that yields existence and uniqueness within a computationally tractable framework.

There are three main differences from the standard treatment as explicated in MWG. First, the setting and assumptions are different.

1. While MWG define preferences for the entire positive orthant, our model implicitly defines preferences for a given portfolio on the line segment  $(0, q)$ , representing partial execution of an order to buy the portfolio. The portfolio can be a short

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<sup>8</sup>On the other hand, Antill and Duffie (2020) find that fragmentation of trade of the same asset across multiple trading venues is unambiguously negative for efficiency in the case where one trading venue is the center of price discovery and other trading venues engage in size discovery (i.e., trade at the price discovered by the price-discovery venue).

position. By defining utility to be minus-infinity off the line segment, we preserve convexity over a larger space, but we lose continuity.

2. While MWG allow general preferences that allow income effects, we impute quasi-linear utility functions of the form  $u(\mathbf{x}) - \boldsymbol{\pi}^\top \mathbf{x}$ , which do not have income effects.
3. While MWG require strongly monotone preferences and strictly positive prices, our implied preferences are not strongly monotone and prices can be negative. Moreover, it may be difficult to make preferences monotone, even over the restricted domain of agents' demands, because there is no natural "up" direction for the legs of a pairs trade.

Second, the technique to prove the existence of market-clearing prices and quantities is distinct. While MWG relies on Kakutani's fixed-point theorem, we use quadratic programming.

Third, while market-clearing prices may not be unique in MWG, we have uniqueness up to a convex set. This results from using quasi-linear utility, making the second derivative of the planner's objective function negative (semi) definite. This guarantees that all market-clearing prices must lie in a convex set. In our framework, substitutes and complements do not matter for existence or uniqueness, since the matrix is negative semidefinite anyway.

**Relationship to the Indivisible Goods Literature** Our assumptions are in some respects more similar to assumptions made in the literature on indivisible goods, which typically uses quasi-linear utility.

Kelso and Crawford (1982) show that competitive equilibrium is guaranteed to exist in an indivisible goods setting under a substitutes condition. There have been many different variations of the Kelso–Crawford substitutes condition defined in the literature; see Gul and Stacchetti (1999), Milgrom (2000), Hatfield and Milgrom (2005), Ostrovsky (2008), Hatfield et al. (2013). Hatfield, Kominers, and Westkamp (2021) discuss the relationship among many of these criteria and provide a maximum domain result for existence.

Baldwin and Klemperer (2019), on the other hand, use tropical geometry to show that existence can be obtained not only when indivisible goods are substitutes but also

in some cases when they are complements. For example, left shoes and right shoes are clearly complements, but prices for shoes may nevertheless be guaranteed to exist if all agents' preferences regard them as complements in ways that enable the application of the Baldwin and Klemperer (2019) existence theorems. For example, if all agents purchase shoes as pairs, and no agents regard left shoes and right shoes as substitutes for each other, prices are guaranteed to exist.

Unlike Baldwin and Klemperer (2019), or most of the indivisible-goods substitutes literature, we obtain existence for *any* preferences expressible in our language. This stronger existence result relies on our treatment of assets as perfectly divisible (avoiding the potential difficulties of exact market clearing when there are indivisibilities) and—as noted above in the discussion of the relationship to general equilibrium theory—the restriction that preferences are only defined for each portfolio on a line segment exactly corresponding to those portfolio weights, as opposed to preferences being well defined on a richer consumption space.

Two other papers in the indivisible goods literature that deserve special mention are Klemperer (2010), which proposes the product-mix auction, and Milgrom (2009), which proposes the assignment auction. (These papers in turn descend from Shapley and Shubik (1971) and Demange, Gale, and Sotomayor (1986)). Both papers describe multi-object auction designs that use linear preference languages and are motivated in part by financial applications—Klemperer's auction, in particular, was designed for the Bank of England to purchase toxic financial assets during the financial crisis. Technically, the key difference versus our proposal is the preference language. In our design, participants have piecewise-linear demands for portfolios of assets, which can have arbitrary user-defined positive and negative asset weights. In Klemperer's and Milgrom's designs participants have piecewise-constant demands, expressing preferences over mutually-exclusive substitutable assets, including Shapley–Shubik unit-demand for substitutes preferences as a special case. For example, our design would allow a user to buy a portfolio consisting of assets A and B in some user-specified ratio, with downward-sloping demand for the portfolio, whereas Klemperer's and Milgrom's auction designs would allow the user to buy a specified quantity of whichever of A or B gives them more surplus at realized prices. This difference in language then drives differences in the statements and methods of proof for existence and uniqueness results. Practically, the papers have dif-

ferent intended use cases. We have in mind near-continuous trading of financial assets, in which users trade portfolios in flows. Klemperer’s and Milgrom’s designs are intended for one-shot, high-value allocation problems (e.g., a high-value auction for toxic assets during the financial crisis, or a spectrum auction).

## 3 Flow Orders

### 3.1 Formal Definition of Flow Orders

Traditional limit orders consist of a price, quantity, and direction of trade for a single symbol. For example, buy 1000 shares of AAPL at \$150.00 per share. The order implicitly defines a demand curve that is a step function, with full demand (1000 shares) at any price weakly better than the limit and zero demand at any price strictly worse than the limit.

Flow orders depart from traditional limit orders in 3 ways:

1. *Orders are for portfolios of assets instead of individual assets.* A portfolio is defined by a vector of weights,  $\mathbf{w}_i := (w_{i1}, \dots, w_{iN})^\top$ , where  $i$  identifies the order,  $N$  denotes the number of assets in the market, and  $w_{in} \in \mathbb{R}$  denotes the portfolio weight of asset  $n$  in order  $i$ . A strictly positive weight denotes buying the asset, a strictly negative weight denotes selling the asset, and a zero weight denotes that the asset is not a part of that portfolio.
2. *Flow orders specify piecewise-linear downward-sloping demands.* Each order specifies two prices: a lower limit  $p_i^L$  and an upper limit  $p_i^H$ , with  $p_i^L < p_i^H$ . The flow order interprets  $p_i^L$  as a demand to buy the portfolio in full quantity at prices weakly lower than  $p_i^L$ . It interprets  $p_i^H$  as indicating zero demand for the portfolio at prices weakly higher than  $p_i^H$ . Then, in the interval  $[p_i^L, p_i^H]$ , the flow order linearly interpolates the quantity demanded from full quantity at  $p_i^L$  to zero quantity at  $p_i^H$ .<sup>9</sup> Note that we use the phrase “buy the portfolio” to include the case of selling assets—in our language, selling an asset is buying a portfolio with a negative

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<sup>9</sup>In a traditional limit order at price  $p$ , the implied demand is the full quantity at prices weakly better than  $p$  and zero quantity at prices strictly worse than  $p$ . In our language, these two implications of the traditional limit price are split into two separate parameters: demand in full at prices weakly better than the lower limit  $p_i^L$ , and demand zero at prices weakly worse than the upper limit  $p_i^H$ .

weight on the asset at a negative price (i.e., receiving a transfer). We will clarify this point in detail below.

3. *Quantities are expressed as flows per batch interval, up to a cumulative quantity limit.* For each order  $i$ , the user specifies two parameters,  $q_i > 0$  and  $Q_i^{\max} > 0$ , expressing their demand to buy up to a maximum rate of  $q_i$  portfolio units per batch interval, up to a cumulative quantity limit of  $Q_i^{\max}$ . Instead of requiring that quantities express a demand to trade immediately (1000 shares now), users can tune their urgency to trade.

Thus, a flow order is described by the tuple  $(\mathbf{w}_i, p_i^L, p_i^H, q_i, Q_i^{\max})$ . (Throughout this paper, we use a lower-case bold font to denote vectors, an upper-case bold font to denote matrices, a subscript  $i$  to denote orders, and a subscript  $n$  to denote assets.)

Next, we define a flow order's demand within a batch auction. Assume that the order's cumulative purchased quantity is not within  $q_i$  of  $Q_i^{\max}$ , so that the order can purchase its maximum rate  $q_i$  in the next batch without exceeding  $Q_i^{\max}$ .<sup>10</sup> Let  $\boldsymbol{\pi} = (\pi_1, \dots, \pi_N)^\top$  denote the column vector of market prices of all assets  $n = 1, \dots, N$ . The market price for the portfolio defined by the weight vector  $\mathbf{w}_i$  is the inner product

$$p_i = \mathbf{w}_i^\top \boldsymbol{\pi} := \sum_{n=1}^N w_{in} \pi_n. \quad (1)$$

Order  $i$  specifies demand per batch auction in portfolio units as a function of the portfolio's price. The demand curve, which we call its "flow portfolio demand," is the downward-sloping and piecewise-linear function defined by

$$D_i(p_i | \mathbf{w}_i, q_i, p_i^L, p_i^H) := q_i \text{trunc} \left( \frac{p_i^H - p_i}{p_i^H - p_i^L} \right), \quad \text{where} \quad \text{trunc}(z) := \begin{cases} 1, & \text{for } z \geq 1 \\ z, & \text{for } 0 < z < 1 \\ 0, & \text{for } z \leq 0 \end{cases}. \quad (2)$$

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<sup>10</sup>In the case where the order's cumulative purchased quantity, say  $Q_i^t$ , is within  $q_i$  of the limit  $Q_i^{\max}$ , replace  $q_i$  with the remaining quantity demanded  $Q_i^{\max} - Q_i^t$ , and increase  $p_i^L$  so that the slope of the demand curve is the same as it was originally.

Now, let  $x_i$  denote the flow portfolio demand evaluated at a given portfolio price:

$$x_i := D_i(p_i). \quad (3)$$

To distinguish from flow portfolio demand as a function, we call  $x_i$  order  $i$ 's "trade rate."

Notice how the trade rate depends on the order's maximum rate  $q_i$  and where the price for the portfolio is relative to the order's price parameters  $p_i^L$  and  $p_i^H$ . If the portfolio price  $p_i$  is less than or equal to  $p_i^L$ , the order is "fully executable," and the portfolio is bought at the maximum rate  $q_i$ . If the portfolio price  $p_i$  is higher than  $p_i^H$ , then the order is "nonexecutable" and does not buy at all. If the portfolio price is somewhere between  $p_i^H$  and  $p_i^L$ , the order is "partially executable" and buys at the rate determined by linear interpolation between the two price parameters.

**Buying vs. Selling** This formulation treats "selling" an asset as buying a portfolio with a negative weight on that asset at a negative price. This not only generates compact notation for representing both buying and selling but also emphasizes a symmetry between buying and selling, which will be important for understanding how market clearing works. General equilibrium theory often uses this idea that an upward-sloping supply curve for positive quantities is equivalent to a downward-sloping demand curve for negative quantities.

Whether buying or selling, we have  $p_i^L < p_i^H$  and demand defined according to equation (2). However, when selling, both  $p_i^L$  and  $p_i^H$  are negative. For example, an order to sell XYZ in full at price \$42.00 or higher, with the sell rate declining linearly to zero at price \$41.00, would be encoded with  $p_i^L = -\$42.00$  and  $p_i^H = -\$41.00$ . There are two equivalent ways to remember this. First, think of  $p_i^L$  as analogous to the price limit in a limit order (willing to trade in full at this price or better), with demand then declining linearly to zero in the interval  $[p_i^L, p_i^H]$ . Alternatively, think of  $p_i^H$  as the price at which the trader is exactly indifferent between trading and not. Then, as the price improves from  $p_i^H$ , the trader's demand increases linearly, up to a maximum rate of  $q_i$  when the price reaches  $p_i^L$  or better.

See Figure 1 for an illustration of buying and selling.

Last, note that if a portfolio has both positive and negative weights, there may not be a natural buying versus selling direction to the order. We treat all orders as "buying the

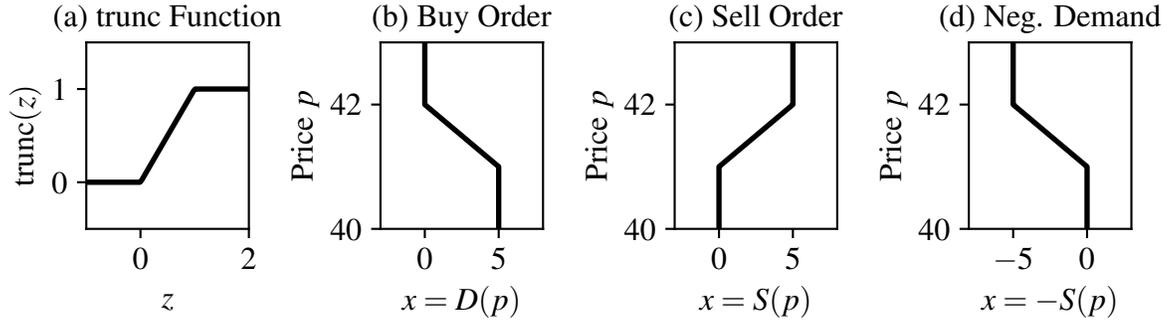


Figure 1: Plots of (a) the function  $\text{trunc}(z)$ ; (b) a single buy order, with pricing parameters  $p_i^L = \$41.00$  and  $p_i^H = \$42.00$ , and maximum rate  $q_i = 5.00$  portfolio units per batch; (c) a single sell order, initially plotted as an upward-sloping supply curve with one upward-sloping linear segment, and (d) the same sell order, now plotted as a downward-sloping demand for negative quantities, which is our treatment here. The pricing parameters for the sell order are  $p_i^L = -\$42.00$  and  $p_i^H = -\$41.00$ , with maximum rate  $q_i = 5.00$  portfolio units per batch. The figures for buy and sell orders are plotted with trade rate on the horizontal axis and price on the vertical axis.

portfolio” without loss of generality.

**Additional Technical Remarks on the Formulation** We make two additional remarks on this formulation.

First, observe that while the above demand curve in equation (2) has a single downward-sloping segment, the user can define an arbitrary piecewise-linear downward-sloping demand curve for a given portfolio with multiple flow orders.

Second, order specification using the tuple of parameters  $(\mathbf{w}_i, p_i^L, p_i^H, q_i, Q_i^{\max})$  contains an intentional redundancy of notation. Buying a portfolio containing one share each of two stocks at a rate of ten portfolio units per batch is equivalent to buying a portfolio containing half a share of each stock at a rate of twenty portfolio units per batch. More generally, for some parameter  $\alpha > 0$ , changing the order parameters from  $(\mathbf{w}_i, p_i^L, p_i^H, q_i, Q_i^{\max})$  to  $(\alpha\mathbf{w}_i, \alpha p_i^L, \alpha p_i^H, q_i/\alpha, Q_i^{\max}/\alpha)$  has no effect on the demand for each asset. We do this because in some circumstances it will be natural to normalize some stocks’ individual weights to one or minus one, while in others it may be more natural to normalize the sum of weights.

**Proxy Instructions For Orders Over Time** As in the traditional market design, users may modify or cancel their flow orders at any moment in time throughout the trading day. Additionally, users may want to specify what we will refer to as “proxy instructions” that modify or cancel their orders under specified contingencies.

The parameter  $Q_i^{\max}$  is an example of such a proxy instruction: cancel the order from the market once the cumulative quantity limit  $Q_i^{\max}$  has been reached. Another example is time-in-force instructions, such as “good for day” or good for some other specified period. In principle, the exchange could provide more complex examples, such as allowing an order’s pricing parameters to vary dynamically over time as a function of recent prices (“Ensure that my order’s price impact is never more than ten basis points”), or allowing an order’s maximum rate to vary over time (“Reduce this order’s maximum rate if I am averaging above ten percent of trading volume”). We will not discuss such complex order contingencies in this paper.

## 3.2 Examples

We give several examples to illustrate the flexibility of flow orders.

1. Standard limit order.

A standard limit order expresses preferences to buy or sell a specified quantity of one asset at one limit price. A flow order can be specified to approximate a limit order. First, when only one weight  $w_n$  is nonzero, the order is an order to buy one asset if the weight is positive or to sell one asset if the weight is negative. Second, the maximum rate  $q_i$  can be set to equal the cumulative quantity the trader wants to buy or sell,  $Q_i^{\max}$ . Third, the price parameters can be set so that  $p_i^L$  corresponds to the intended limit price and  $p_i^H$  is as close as possible to  $p_i^L$ . Theoretically, we obtain a limit order in the limit as  $p_i^H \rightarrow p_i^{L+}$ .

2. Time-weighted average price (TWAP) order.

In the traditional market design, a market order executes immediately at the market-clearing price. The analog here is a time-weighted average price (TWAP) order. The user specifies a price parameter  $p_i^L$  that is sufficiently aggressive relative to re-

cent prices that it is essentially guaranteed to execute.<sup>11</sup> Then, the user will trade  $q_i$  portfolio units in every batch auction until their cumulative quantity limit is achieved (i.e., they will trade at the TWAP over this period).

### 3. Pairs trades.

A pairs trade is executed by specifying a portfolio weight vector  $\mathbf{w}_i$  with one strictly positive entry, one strictly negative entry, and the rest zeros.

### 4. Portfolio trades.

A portfolio trade is executed by specifying a portfolio weight vector  $\mathbf{w}_i$  with either all entries weakly positive (if buying the portfolio) or all entries weakly negative (if selling the portfolio). The assets whose weights are strictly positive or strictly negative comprise the portfolio.

Traders can construct and trade their own index portfolios. For example, an order to buy the S&P 500 has positive weights on each stock in the S&P 500 index, with weights proportional to S&P 500 weights and zero weight on stocks not in the S&P 500 index. An order to sell an index has negative weights on all stocks in the index. Traders can easily customize index portfolios by adjusting portfolio weights—e.g., adjusting weights based on valuation models or setting to zero weights for assets that fail a screening criterion such as environmental, social, and governance criteria.

### 5. General long-short strategies.

A general long-short strategy combines the previous two cases: multiple positive and negative entries.

### 6. Market-making strategies.

A trader can engage in market making, whether for a single asset, a pairs trade, a portfolio trade, or a general long-short strategy, using two orders with opposite-

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<sup>11</sup>In the traditional formulation of a market order, one thinks of the limit price as  $\infty$  if buying and as 0 if selling. The 0 for selling implicitly encodes that assets are “goods” that can always be sold at a weakly positive price. Here, if the order is for a portfolio with both positive and negative weights, it is not automatic from the order itself whether the portfolio is a “good” that should always trade at a positive price or a “bad” that should trade at a negative price. Either way, the trader can guarantee execution by specifying  $p_i^L$  sufficiently large.

signed weights and price parameters. For example, a market maker who is willing to buy portfolio  $\mathbf{w}_i$  in full at \$41.00 and sell it in full at \$42.00 could use orders like

- Buy leg: weights  $\mathbf{w}_i$ , price parameters  $p_i^L = \$41.00$ ,  $p_i^H = \$41.25$
- Sell leg: weights  $-\mathbf{w}_i$ , price parameters  $p_i^L = -\$42.00$ ,  $p_i^H = -\$41.75$

### 3.3 Limitations of the Language

There are limitations of the language for representing trading demands.

First, trading demands are only defined at exactly the ratio of portfolio weights specified in the order. If an order specifies it wants to buy assets A and B at a ratio of 2:1, the order contains no information about the trader's willingness to trade at, say, a ratio of 2.2:1 or 1.8:1. This restriction relative to traditional consumer theory, where preferences are typically defined on the whole positive orthant, is key to our method of existence proof (below in Section 4.2).

Second, trading demands are piecewise linear within each order. In principle, we could replace the piecewise-linear trunc function with the flexibility to specify an arbitrary downward-sloping function on the interval of prices  $[p_i^L, p_i^H]$ . However, our existence proof and computational results take advantage of this linearity. We view the linearity restriction as a less important limitation because arbitrary downward-sloping functions can be approximated, if needed, with a set of piecewise-linear orders.

Third, the language does not allow for indivisibilities. Most importantly, a user cannot specify a minimum transaction quantity per batch, only a maximum. So, for example, an order cannot be "fill or kill," or "at least 100 shares per batch, otherwise stay out." That said, a user may approximate such preferences with marketable orders if prices are sufficiently continuous.

Last, the language does not allow for in-order contingencies. This includes cases like "buy A if the price of B is high enough" or "buy whichever of A or B gives me more surplus given my valuations." This latter kind of preference expression is analyzed in Demange, Gale, and Sotomayor (1986) and is central to the market design proposals of Klemperer (2010) and Milgrom (2009) discussed in Section 2.2. As with indivisibilities, a user may approximate such preferences with marketable orders if prices are continuous enough.

## 4 Market-Clearing Prices and Quantities

Now we turn our attention to the exchange's problem of finding market-clearing prices and quantities. While flow orders may persist for a long period of time, the market must clear in each batch auction. We therefore study market clearing from the perspective of a single batch auction in isolation.

### 4.1 Definition of Market Clearing

To define market clearing, we need to convert individual traders' demand curves for portfolios as a function of portfolio prices (i.e., the  $D_i(p_i)$ 's) into a market demand curve for assets as a function of asset prices. This is because the market clears asset by asset, using item prices, even though traders place flow orders for arbitrary portfolios.

For each order  $i$ , first replace the portfolio price  $p_i$  with the weighted vector of asset prices, using  $p_i = \mathbf{w}_i^\top \boldsymbol{\pi}$ . Then, convert the demand in portfolio units  $D_i(\mathbf{w}_i^\top \boldsymbol{\pi})$  into the demand for individual assets by multiplying by the portfolio weights  $\mathbf{w}_i$ . Last, sum up the demand for assets across all orders  $i$  to obtain the market's net excess demand curve for assets as a function of asset prices:

$$D(\boldsymbol{\pi}) := \sum_{i=1}^I D_i(\mathbf{w}_i^\top \boldsymbol{\pi} \mid \mathbf{w}_i, q_i, p_i^L, p_i^H) \mathbf{w}_i. \quad (4)$$

The function  $D(\cdot)$  maps asset price vectors  $\boldsymbol{\pi} \in \mathbb{R}^N$  to net asset quantity vectors  $D(\boldsymbol{\pi}) \in \mathbb{R}^N$ . A price vector is market clearing if each asset's net excess demand is zero:

$$D(\boldsymbol{\pi}) = \mathbf{0}. \quad (5)$$

This market-clearing condition defines  $N$  equations in  $N$  unknowns.

For arbitrary, non-clearing price vectors, the quantity vector  $D(\boldsymbol{\pi})$  may have both positive and negative components. Note that we do not enforce a constraint that prices be nonnegative. Negative prices arise naturally in some commodity markets, such as electricity, with limited storage and costly curtailment.

At market-clearing prices  $\boldsymbol{\pi}$ , order  $i$ 's quantity traded for the individual assets in this batch auction is given by its trade rate times the portfolio weights,  $x_i \mathbf{w}_i$ , where  $x_i = D_i(\mathbf{w}_i^\top \boldsymbol{\pi})$ . Thus, using the trade rates (for the  $I$  portfolios), the market-clearing

condition in equation (5) (for the  $N$  assets) can be re-expressed as

$$\sum_{i=0}^I x_i \mathbf{w}_i = \mathbf{0}. \quad (6)$$

## 4.2 Existence of Market-Clearing Prices and Quantities

To show the existence of market-clearing prices and quantities, we formulate an optimization problem by imputing to each order “as-bid” preferences which define the dollar utility value of the number of portfolio units bought, then sum the utility functions across orders to obtain the objective function to be maximized.

An order’s demand is a linear function of prices in the range of prices where the order is partially executable. Therefore, a quadratic quasilinear utility function defines preferences. The constraints preventing overfilling or underfilling the order are linear inequality constraints. Market clearing consists of linear equality constraints. Putting this together results in a quadratic program—maximizing a quadratic objective function subject to linear constraints.

Quadratic programs have been thoroughly studied and are well understood. Given the structure of our problem, we can use well-known results to show that unique utility-maximizing quantities exist, and the solution implies Lagrange multipliers which correspond to market-clearing prices. A solution to the dual problem of calculating optimal (market-clearing) prices also exists and implies the same solution as the original (primal) problem.

As is standard, our market rules optimize as-bid gains from trade. In practice, traders submit orders strategically. Thus, our methodology does not measure actual economic welfare and does not generate welfare results on market efficiency. Rather, the method provides a practical approach to finding market-clearing prices and quantities consistent with bids.

**Pseudo-Utility** Let  $V_i(x_i)$  denote the dollar utility of order  $i$  from a trade rate of  $x_i = D_i(p_i)$  in portfolio units per second, where flow portfolio demand  $D_i(p_i)$  is given by equation (2). To find  $V_i(x_i)$ , we first define the marginal utility function  $M_i(x_i)$  as the inverse demand curve,  $p_i = M_i(x_i)$ . In words, the inverse demand curve maps order  $i$ ’s

trade rate  $x_i \in [0, q_i]$  into prices  $p_i \in [p_i^L, p_i^H]$ .<sup>12</sup> Rearranging equation (2) we have:

$$M_i(x_i) := p_i^H - \frac{p_i^H - p_i^L}{q_i} x_i \quad \text{for } x_i \in [0, q_i]. \quad (7)$$

The value of  $M_i(x_i)$  measures marginal as-bid flow value in dollars per portfolio unit. Utility  $V_i(x_i)$ , as a function of the trade rate  $x_i$ , is defined as the integral of the marginal utility function over the interval  $[0, x_i]$ :

$$V_i(x_i) := \int_0^{x_i} M_i(u) du \quad (8)$$

Since the marginal value is linear in  $x_i$ , the total value is quadratic and therefore strictly concave in  $x_i$ :

$$V_i(x_i) = p_i^H x_i - \frac{p_i^H - p_i^L}{2q_i} x_i^2 \quad (9)$$

We will think of  $V_i(x_i)$  as defined for all  $x_i \in \mathbb{R}$ , with order specifications imposing the constraint  $x_i \in [0, q_i]$ .<sup>13</sup>

**Value Maximization** Our problem of finding market-clearing prices is formulated as two optimization problems, a primal problem of finding quantities that maximize as-bid dollar value and a dual problem of finding prices that minimize the cost of non-clearing prices. The first-order conditions for optimality of these two problems imply market-clearing prices and quantities.

The exchange, acting analogously to a social planner in general equilibrium theory, chooses a vector of trade rates for all orders  $\mathbf{x} = (x_1, \dots, x_I)$  to maximize aggregate value, defined as the sum of pseudo-utility functions across orders,

$$V(\mathbf{x}) := \sum_{i=1}^I V_i(x_i) \quad \text{for } \mathbf{x} \in \mathbb{R}^I, \quad (10)$$

<sup>12</sup>For trade rates in the interval  $(0, q_i)$ , the fact that the order chooses an interior trade rate tells us that the order's as-bid marginal utility is equal to the corresponding price in the interval  $(p_i^L, p_i^H)$ . The same logic extends to the boundary points 0 and  $q_i$ , corresponding respectively to prices  $p_i^H$  and  $p_i^L$ , by assuming as-bid utility is continuous.

<sup>13</sup>We could equivalently think of the domain of  $V_i(x_i)$  as  $x_i \in [0, q_i]$  or define  $V_i(x_i) = -\infty$  for  $x_i \notin [0, q_i]$ .

subject to market-clearing constraints and trade-rate constraints:

$$\max_{\mathbf{x}} V(\mathbf{x}) \quad \text{subject to} \quad \begin{cases} \sum_{i=0}^I x_i \mathbf{w}_i = \mathbf{0} & \text{(market-clearing constraints)} \\ x_i \in [0, q_i] \text{ for all } i & \text{(trade-rate constraints)}. \end{cases} \quad (11)$$

The objective function  $V(\mathbf{x})$  is concave because it is a sum of concave functions.

Indeed, since the objective function is quadratic and the constraints are linear, this is a quadratic program. To make this quadratic structure apparent using matrix and vector notation, let  $\mathbf{W}$  denote the  $N \times I$  matrix whose  $i$ th column is  $\mathbf{w}_i$ . Let  $\mathbf{p}^H$  denote the column vector whose  $i$ th element is  $p_i^H$ . Let  $\mathbf{D}$  denote the  $I \times I$  positive definite diagonal matrix whose  $i$ th diagonal element is  $(p_i^H - p_i^L)/q_i$ . Then the problem in equation (11) may be written compactly as

$$\max_{\mathbf{x}} \left[ \mathbf{x}^\top \mathbf{p}^H - \frac{1}{2} \mathbf{x}^\top \mathbf{D} \mathbf{x} \right] \quad \text{subject to} \quad \mathbf{W} \mathbf{x} = \mathbf{0} \quad \text{and} \quad \mathbf{0} \leq \mathbf{x} \leq \mathbf{q}. \quad (12)$$

We first show that quantities that maximize aggregate utility exist. Then we show that market-clearing prices exist by examining the dual problem to the utility maximization problem.

**Theorem 1** (Existence and Uniqueness of Optimal Quantities). *There exists a unique vector of trade rates  $\mathbf{x}$  which solves the maximization problem in equation (12).*

*Proof.* The problem has the following properties.

1. Compactness and convexity: the inequality constraints on trade rates define the Cartesian product of  $I$  intervals,  $[0, q_1] \times \cdots \times [0, q_I]$ , which is compact and convex. The market-clearing conditions are linear constraints, which define the intersection of hyperplanes. The intersection of a compact, convex set with hyperplanes is compact and convex. Thus, the set of vectors of trade rates  $\mathbf{x}$  that satisfies all constraints is compact and convex.

2. Feasibility: no trade ( $\mathbf{x} = \mathbf{0}$ ) generates well-defined utility for each order ( $V_i(0) = 0$ ), clears the market and is allowed on each order. No-trade is feasible.

3. Strict concavity: the objective  $V$  is strictly concave since the Hessian matrix,  $-\mathbf{D}$ , is negative definite.

It is a well-known principle of convex analysis that a strictly concave objective func-

tion on a non-empty compact and convex set has a unique maximizing vector  $\mathbf{x}$  (Bertsekas (2009, Propositions 3.1.1, 3.2.1)).

□

To prove that market-clearing prices exist, we exploit the duality between the problems of finding optimal prices and quantities. For this, we define a Lagrangian function of the vector of trade rates  $\mathbf{x}$  with three constraints: (1) the market clears ( $\mathbf{W}\mathbf{x} = \mathbf{0}$ ); (2) the trade rates are greater than or equal to zero ( $\mathbf{x} \geq \mathbf{0}$ ); (3) the trade rates are less than or equal to their maxima ( $\mathbf{x} \leq \mathbf{q}$ ). In vector notation, the Lagrangian is defined by

$$L(\mathbf{x}, \boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu}) := \mathbf{x}^\top \mathbf{p}^H - \frac{1}{2} \mathbf{x}^\top \mathbf{D} \mathbf{x} - \boldsymbol{\pi}^\top \mathbf{W} \mathbf{x} + \boldsymbol{\mu}^\top \mathbf{x} + \boldsymbol{\lambda}^\top (\mathbf{q} - \mathbf{x}). \quad (13)$$

Since the multipliers associated with the market-clearing equality constraints have the economic interpretation of market prices for assets, we use the notation  $\boldsymbol{\pi} = (\pi_1, \dots, \pi_N)^\top$  for these multipliers. Two vectors of multipliers,  $\boldsymbol{\mu} = (\mu_1, \dots, \mu_I)^\top$  and  $\boldsymbol{\lambda} = (\lambda_1, \dots, \lambda_I)^\top$ , are associated with inequality constraints on trade rates, with two constraints for each order.

The dual problem associated with the primal problem of maximizing aggregate utility in equation (12) is then defined by

$$\hat{G}(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu}) := \max_{\mathbf{x}} L(\mathbf{x}, \boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu}) \quad \text{for} \quad \boldsymbol{\pi} \in \mathbb{R}^N, \quad \boldsymbol{\mu} \geq \mathbf{0}, \quad \boldsymbol{\lambda} \geq \mathbf{0}. \quad (14)$$

The dual problem is a minimization problem with infimum  $g$  defined by

$$g := \inf_{\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu}} \hat{G}(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu}) \quad \text{subject to} \quad \boldsymbol{\pi} \in \mathbb{R}^N, \quad \boldsymbol{\mu} \geq \mathbf{0}, \quad \boldsymbol{\lambda} \geq \mathbf{0}. \quad (15)$$

The dual problem in equation (15) is formulated as an infimum rather than a minimum because we have not yet shown that there exists a solution  $(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu})$  which attains the infimum.

**Theorem 2** (Existence of market-clearing prices). *There exists at least one optimal solution  $(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu})$  to the dual problem in equation (15). The solutions  $\mathbf{x}$  and  $(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu})$  are a primal-dual pair which satisfies the strict duality relationship*

$$g = V(\mathbf{x}). \quad (16)$$

*Proof of Theorem 2.* The primal problem has the following properties.

1. Strict concavity: the objective function  $V(\mathbf{x})$  is strictly concave.
2. Finite solution: the primal objective is the sum of a finite number of concave quadratic functions. Since each quadratic function is bounded above, the solution to the primal problem is bounded above.
3. Linear constraints: the minimum rate constraints  $\mathbf{x} \geq \mathbf{0}$ , the maximum rate constraints  $\mathbf{x} \leq \mathbf{q}$ , and the market-clearing constraints  $\mathbf{W}\mathbf{x} = \mathbf{0}$  are all linear.
4. Feasibility: no trade ( $\mathbf{x} = \mathbf{0}$ ) is feasible because it clears the market and is allowed on each order.<sup>14</sup>

It is a standard result from convex programming that a concave primal problem, a finite supremum on the primal problem, feasibility, and linear constraints guarantee that a solution to the dual problem exists and has the same optimal value as the supremum to the primal problem even if a solution to the primal problem does not exist as it does in our problem (Bertsekas (2009, Proposition 5.3.4)). Since Theorem 1 guarantees that a solution to the primal problem does exist, the solution to the primal problem has the same value as the solution to the dual problem.  $\square$

Theorem 2 does not guarantee that market-clearing prices are unique. The set of market-clearing prices is convex and may be unbounded. A trivial example occurs when all orders are buy orders for individual assets, and there are no sell orders. Then any sufficiently high price clears the market with zero trade. There may also be cases where the market-clearing price is not unique even when trade occurs. A trivial example occurs when there is one buy order and one sell order for the same asset (or portfolio) with the same maximum rate, and the buyer's lower limit price exceeds the absolute value of the seller's lower limit price. In this case, there is an interval of prices where both orders are fully executable. We discuss a tie-breaking rule to pick a unique price in the next section.

## 5 Computation

In this section, we study the computational feasibility of flow trading. The objective is to provide a proof of concept, finding market-clearing solutions in less than a second

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<sup>14</sup>Feasibility does not require a strict interior point (Slater's condition) because the constraints are linear in this problem (linear constraint qualification).

for a reasonably difficult problem with 500 assets and 100,000 orders, using an ordinary workstation. We also study how computation time varies with the numbers of assets and orders and parameters that affect how orders are generated. Section 5.1 proposes a computational methodology. Section 5.2 explores computational performance in a simulation environment.

## 5.1 Methodology

**Gradient Method** For economists, Walrasian tatonnement is an intuitive approach for calculating market-clearing prices. An auctioneer announces tentative prices, and traders respond with their quantities. The auctioneer then adjusts prices in the direction proportional to net excess demand. The process continues until the market clears.

Tatonnement is equivalent to applying the gradient optimization method to an objective function of prices whose first-order conditions correspond to market clearing. In our setting, such a function can be obtained as

$$G(\boldsymbol{\pi}) := \inf_{\boldsymbol{\lambda}, \boldsymbol{\mu}} \hat{G}(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu}) \quad \text{subject to} \quad \boldsymbol{\mu} \geq \mathbf{0}, \quad \boldsymbol{\lambda} \geq \mathbf{0}, \quad (17)$$

where  $\hat{G}(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu})$  is given by equation (14). Theorem 2 implies that this function's first order conditions,  $G'(\boldsymbol{\pi}) = \mathbf{0}$ , correspond to market clearing.

Since the function  $G(\boldsymbol{\pi})$  has a piecewise-linear derivative, it is continuously differentiable, and the derivative satisfies a Lipschitz condition.<sup>15</sup> These conditions assure that the gradient method converges (Nesterov (2004, Corollary 2.1.2, p. 70)). While the guaranteed convergence rate is much faster than for the traditional general-equilibrium theory problems discussed by Scarf and Hansen (1973),<sup>16</sup> it is too slow for our purpose. Reducing the error by a factor of one million may require approximately one million iterations (Gondzio (2012)). It is a prohibitively large number in our setting, where we need to solve for prices frequently throughout the trading day (as opposed to a single high-stakes allocation problem in a combinatorial auction).

<sup>15</sup>There is a Lipschitz constant  $L$  such that  $|\nabla G(\boldsymbol{\pi} + \Delta\boldsymbol{\pi}) - \nabla G(\boldsymbol{\pi})| < L|\Delta\boldsymbol{\pi}|$  for all  $\boldsymbol{\pi}$  and all  $\Delta\boldsymbol{\pi}$ .

<sup>16</sup>More modern work in computer science has focused on the complexity of computing Brouwer and Kakutani fixed points (Daskalakis, Goldberg, and Papadimitriou (2009), Budish, Cachon, Kessler, and Othman (2017)) and supports the claim that computing competitive equilibrium prices can be computationally difficult.

### 5.1.1 Interior Point Method

We solve the quadratic program in equation (12) using an interior point method. The literature shows that interior point methods are computationally more efficient than the more intuitive gradient method, both theoretically (Nesterov (2004, Chapter 4), Bertsekas (2009), Boyd and Vandenberghe (2004)) and in practice (Gondzio (2012)).<sup>17</sup>

**Exchange as a Small Market Maker** Theoretically, the interior point method requires the existence of an interior point, a feasible allocation on the interior of the constraint set. Such an allocation clears the market and strictly satisfies the inequality constraints ( $\mathbf{0} < \mathbf{x} < \mathbf{q}$ ). However, there is no natural candidate for such an interior point in our setting. For example, no trade ( $\mathbf{x} = \mathbf{0}$ ), which satisfies market clearing, does not lie on the interior of the constraints.

To ensure the existence of an interior point, we let the exchange act as a small market maker for every asset. Specifically, the exchange submits a linear demand curve for each asset  $n$ ,

$$\epsilon_n(\pi_{0n} - \pi_n), \quad (18)$$

where  $\epsilon_n$  is the slope, and  $\pi_{0n}$  is a base price below which the exchange buys and above which it sells. Here,  $\epsilon_n$  can be a small positive number such that the exchange does little trading. The strategy can be implemented by placing two flow orders for each asset: one order to buy at prices below  $\pi_{0n}$  and the other to sell at prices above  $\pi_{0n}$ .<sup>18</sup> With the exchange as a small market maker, existence of an interior point is assured. For example, pick any  $\mathbf{x}$  such that  $\mathbf{0} < \mathbf{x} < \mathbf{q}$ . Then the exchange can soak up any uncleared quantities to clear the market.

Allowing modest exchange trading has two other benefits. First, it resolves the tiebreaker

<sup>17</sup>For interior point methods, the maximum number of iterations has an upper bound proportional to  $O(\log(1/\epsilon))$ , where  $\epsilon$  is the proportion by which the error is reduced (Nesterov (2004) Theorem 3.1). For example, reducing error by proportion 0.000001 (one-millionth) is  $O(\log(1,000,000)) \approx O(13.8)$ .

<sup>18</sup>The buy order can be implemented with an upper limit price of  $p_H = \pi_{0n}$ , a lower limit price of  $p_L$  such that  $(p_H - p_L)$  is a large positive number, a portfolio weight vector with weight 1 on asset  $n$  and weight 0 on all other assets, and a maximum rate of  $q = \epsilon_n(p_H - p_L)$ . The sell order can be implemented analogously but with  $p_H = -\pi_{0n}$ . One very conservative way to set the lower limit price is to choose  $p_L$  such that  $\epsilon_n(p_H - p_L)$  is the  $n$ th element of the matrix-vector product  $\text{abs}(\mathbf{W})\mathbf{q}$ , where  $\text{abs}(\mathbf{W})$  is the element-by-element absolute value of the portfolio weight matrix  $\mathbf{W}$ . This guarantees that the exchange can, in principle, take the other side of any combined demands of all other market participants (satisfying  $\mathbf{0} < \mathbf{x} < \mathbf{q}$ ), even for extreme prices diverging towards plus or minus infinity.

problem, which arises when the convex set of market-clearing prices contains more than one point (as we know is otherwise possible from Theorem 2). Since the exchange has an active order for every asset at every potentially market-clearing price vector, market prices are chosen uniquely for all assets when multiple prices would otherwise be possible. For example, if  $\pi_{0n}$  is set at the previous market-clearing price for asset  $n$ , then the exchange's small trading will tend to break ties in favor of the prices closest to the previous prices. Second, the exchange can absorb uncleared quantities due to rounding error and inexact algorithm convergence to market-clearing prices, even when the algorithm has converged to a target tolerance.

**Solving the KKT Conditions** We use a primal-dual interior-point method to solve the Karush–Kuhn–Tucker (KKT) conditions. This approach finds market-clearing prices and quantities utilizing information about both quantities from the primal problem and prices and multipliers from the dual problem.

From here on, we redefine  $\mathbf{p}^H$ ,  $\mathbf{p}^L$ ,  $\mathbf{D}$ ,  $\mathbf{W}$ ,  $\mathbf{q}$ , and  $\mathbf{x}$  to include the exchange's orders. Then the results from Section 4 hold, and it is straightforward to show that a solution to the KKT conditions clears the market. Further, since the exchange has an active order at any market-clearing price, the solution is unique.

**Theorem 3** (Karush–Kuhn–Tucker (KKT) Conditions with Exchange Trading). *Any solution of the KKT conditions in equations (19)–(22) for trade rates  $\mathbf{x} := (x_1, \dots, x_I)$  and multipliers  $(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu})$  is a solution to both the primal problem and dual problem:*

$$\mathbf{W}\mathbf{x} = \mathbf{0}, \quad \mathbf{0} \leq \mathbf{x} \leq \mathbf{q}, \quad (\text{Primal Feasibility}) \quad (19)$$

$$\boldsymbol{\pi} \in \mathbb{R}^N, \quad \boldsymbol{\lambda} \geq \mathbf{0}, \quad \boldsymbol{\mu} \geq \mathbf{0}, \quad (\text{Dual Feasibility}) \quad (20)$$

$$\mathbf{p}^H - \mathbf{D}\mathbf{x} - \mathbf{W}^\top \boldsymbol{\pi} + \boldsymbol{\mu} - \boldsymbol{\lambda} = \mathbf{0}, \quad (\text{Primal Optimality}) \quad (21)$$

$$\boldsymbol{\lambda} \cdot (\mathbf{q} - \mathbf{x}) = \mathbf{0}, \quad \boldsymbol{\mu} \cdot \mathbf{x} = \mathbf{0}, \quad (\text{Complementary Slackness}) \quad (22)$$

where the dot product in equation (22) represents element-by-element multiplication of vectors. With exchange trading defined in equation (18), there exists a unique solution to the KKT conditions.

*Proof of Theorem 3.* Existence is a straightforward consequence of Theorems 1 and 2,

which imply that a unique optimal primal solution  $\mathbf{x}$  exists and some optimal dual solution  $(\boldsymbol{\pi}, \boldsymbol{\lambda}, \boldsymbol{\mu})$  exists, and these solutions form a primal-dual pair with the same optimized value. Uniqueness follows from the exchange having a partially executable order for every asset at market-clearing prices. If market-clearing prices were not unique, then any change in the price of any asset would change the aggregate quantity demanded, which implies multiple market-clearing quantities. Since the quantities are unique from Theorem 1, prices must therefore also be unique.  $\square$

Instead of solving these conditions directly, the interior point method first modifies the problem by replacing the complementary slackness conditions in equation (22) with a set of constraints parameterized by a scalar  $\bar{\nu} > 0$ :

$$\boldsymbol{\lambda} \cdot (\mathbf{q} - \mathbf{x}) = \bar{\nu} \mathbf{1}, \quad \boldsymbol{\mu} \cdot \mathbf{x} = \bar{\nu} \mathbf{1}. \quad (23)$$

Then in the limit as  $\bar{\nu} \rightarrow 0$ , the sequence of solutions to the modified KKT conditions satisfies the original KKT conditions in Theorem 3.

The modified complementary slackness conditions in equation (23) imply that a solution to the modified KKT conditions satisfies the constraints with strict inequality:  $\mathbf{0} < \mathbf{x} < \mathbf{q}$ . Exchange trading plays a role in guaranteeing the existence of such a solution for any  $\bar{\nu} > 0$ .

**Implementation Details** Our algorithmic strategy solves the modified KKT conditions in equations (19), (20), (21), and (23) iteratively by starting with an initial guess for  $\mathbf{x}$ ,  $\boldsymbol{\pi}$ ,  $\boldsymbol{\mu}$ ,  $\boldsymbol{\lambda}$  satisfying  $\mathbf{0} < \mathbf{x} < \mathbf{q}$  (interior point),  $\boldsymbol{\mu} > \mathbf{0}$ ,  $\boldsymbol{\lambda} > \mathbf{0}$  (positive multipliers).<sup>19</sup> To find search directions  $(\Delta \mathbf{x}, \Delta \boldsymbol{\pi}, \Delta \boldsymbol{\mu}, \text{ and } \Delta \boldsymbol{\lambda})$ , we first substitute  $\mathbf{x} + \Delta \mathbf{x}$ ,  $\boldsymbol{\pi} + \Delta \boldsymbol{\pi}$ ,  $\boldsymbol{\mu} + \Delta \boldsymbol{\mu}$ , and  $\boldsymbol{\lambda} + \Delta \boldsymbol{\lambda}$  for  $\mathbf{x}$ ,  $\boldsymbol{\pi}$ ,  $\boldsymbol{\mu}$ , and  $\boldsymbol{\lambda}$ , respectively into the system of equations representing the modified KKT conditions with the value of  $\bar{\nu}$  set to 0. Then we linearize the system of equations by

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<sup>19</sup>Our own Python implementation of the interior point methodology follows the algorithm described by Vandenberghe (2010) for the CVXOPT package and is tailored to our specific quadratic program (which has an invertible diagonal matrix  $\mathbf{D}$  and simple “Euclidean cone” constraints  $\mathbf{0} \leq \mathbf{x} \leq \mathbf{q}$ ). One version of the algorithm is implemented on cpu using the Python packages numpy and scipy. Another version is implemented on both cpu and gpu using the Python package Pytorch. Results are reported for the Pytorch implementation on the gpu, which was three times faster than either cpu version. Our implementation code will be posted publicly upon publication and is available to interested readers upon request. The Python programming language and the CVXOPT package (not actually used) are free and publicly available.

dropping the second order terms ( $\Delta \mathbf{x} \cdot \Delta \boldsymbol{\mu}$  and  $\Delta \mathbf{x} \cdot \Delta \boldsymbol{\lambda}$  in the modified complementary slackness conditions in equation (23)) and solve the resulting linear system for  $\Delta \mathbf{x}$ ,  $\Delta \boldsymbol{\pi}$ ,  $\Delta \boldsymbol{\mu}$ , and  $\Delta \boldsymbol{\lambda}$ .<sup>20</sup> The solution vectors are then multiplied by a scalar  $\alpha$  (with  $0 < \alpha \leq 1$ ) to ensure that the best guess for the next iteration  $\mathbf{x} + \alpha \Delta \mathbf{x}$ ,  $\boldsymbol{\pi} + \alpha \Delta \boldsymbol{\pi}$ ,  $\boldsymbol{\mu} + \alpha \Delta \boldsymbol{\mu}$ ,  $\boldsymbol{\lambda} + \alpha \Delta \boldsymbol{\lambda}$  is such that  $\mathbf{x}$  remains an interior point and the multipliers remain strictly positive, with  $\bar{v}$  eventually approaching zero. Since the KKT conditions are essentially first-order conditions, the linearized approximation is a version of Newton's method.

On each iteration, the linear system is solved in the following way. The multipliers  $\Delta \boldsymbol{\mu}$  and  $\Delta \boldsymbol{\lambda}$  are expressed as functions of  $\Delta \mathbf{x}$ , easy invertibility of the diagonal matrix  $\mathbf{D}$  allows  $\mathbf{x}$  to be expressed as a simple function of  $\boldsymbol{\pi}$ , and substituting the solution for  $\mathbf{x}$  into the market-clearing condition reduces the problem to solving an  $N \times N$  positive definite system for a price update to  $\boldsymbol{\pi}$ , for which a Cholesky decomposition is used.<sup>21</sup> A mathematical derivation of the algorithmic details is in Appendix C.

We can think of the positive definite matrix to be decomposed as a “liquidity matrix” measuring the marginal change in quantities for each asset as a function of small changes in prices for all assets, taking into account both demand for individual assets and demand for portfolios. This liquidity matrix changes with each iteration because it is constructed by implicitly assigning weights to each order based on changing values of multipliers  $\boldsymbol{\mu}$  and  $\boldsymbol{\lambda}$ . The weights are close to zero when the multipliers push the trade rate  $x_i$  close to the boundary of the interval  $[0, q_i]$ , and closer to one if the trade rate  $x_i$  implied by the multipliers is closer to the midpoint of the interval  $[0, q_i]$ . The order is expected to be relevant for price discovery at the margin when it is partially executable, which, in the context of an interior point method, means that the weight implied by the multipliers is relatively closer to one than to zero. A new Cholesky decomposition is needed on each iteration to incorporate updated weights from the most recent iteration into the calculation of the new search direction.

<sup>20</sup>The KKT system is nonlinear in the unknowns  $\boldsymbol{\pi}$ ,  $\mathbf{x}$ ,  $\boldsymbol{\mu}$ , and  $\boldsymbol{\lambda}$  only because the complementary slackness condition in equation (23) involves element-by-element multiplication of  $\mathbf{x}$  by  $\boldsymbol{\mu}$  and  $\boldsymbol{\lambda}$ . For  $\boldsymbol{\mu}$  (and analogously for  $\boldsymbol{\lambda}$ ), linearizing  $(\mathbf{x} + \Delta \mathbf{x}) \cdot (\boldsymbol{\mu} + \Delta \boldsymbol{\mu})$  sets the second-order term  $\Delta \mathbf{x} \cdot \Delta \boldsymbol{\mu}$  to a vector of zeros.

<sup>21</sup>As in the original KKT system, the revised KKT system is nonlinear because the revised complementary slackness condition involves element-by-element multiplication of  $\mathbf{x} + \Delta \mathbf{x}$  by  $\boldsymbol{\mu} + \Delta \boldsymbol{\mu}$  and  $\boldsymbol{\lambda} + \Delta \boldsymbol{\lambda}$ . To correct for the error created by dropping the second-order terms  $\Delta \boldsymbol{\mu} \cdot \Delta \boldsymbol{\lambda}$ , we solve the linear system a second time on each iteration (using the same Cholesky decomposition), including a correction term described by Mehrotra (1992) in the second solution.

When there is great liquidity for some portfolios (e.g., the market index) but little liquidity for some other portfolios (e.g., thinly traded individual assets), the matrix to be decomposed is poorly conditioned and nearly singular. By supplying small amounts of liquidity to all assets, exchange trading improves the condition number of this matrix, which makes the Cholesky decomposition unlikely to fail. When there is insufficient exchange trading to prevent the Cholesky decomposition from failing, the algorithm regularizes the matrix by adding small positive quantities to the diagonal. This does not change the optimization problem being solved, but it makes the algorithm more robust at the expense of more iterations.

## **5.2 Results**

### **5.2.1 Simulating the Order Book**

We simulate an order book with parameter settings designed to make the problem realistic and algorithmically difficult. Our goal is to provide a proof of concept, demonstrating that market-clearing prices for 500 assets and 100,000 orders can be solved in less than one second. The number 500 is chosen based on the number of stocks in the S&P 500 index. The number 100,000 is chosen somewhat arbitrarily. After examining the base case, we show how the numbers of assets and orders affect computation times. We also test the robustness of the algorithm by examining how computation times vary when parameter values are much larger or smaller than base-case settings.

Of the 100,000 orders, 50,000 are for individual assets (an average of 100 orders for each asset), 25,000 are for various index portfolios, and 25,000 are for pairs trades. There are also an additional 1000 exchange orders, one buy order and one sell order for each asset. These exchange orders have a tiny slope of 0.01, which corresponds to buying one dollar's worth of an asset when its price falls by one percent. It is intended that the exchange will do minimal trading.

To generate a mix of assets—some very high volume and some thinly traded—we create great variation in the number of orders across assets and the size of orders within assets. The expected number of orders for each asset and the size of orders for a given asset both follow lognormal distributions with large log-standard-deviations of 1.7 and

1.5, respectively.<sup>22</sup> This results in a few individual assets having a large number of orders and some assets having zero or very few orders. Within assets, a few orders are expected to be gigantic and most are expected to be relatively tiny. Mean order size is defined using the market microstructure invariance hypothesis of Kyle and Obizhaeva (2016), which makes mean order size for an individual asset or index proportional to the cube root of expected dollar volume for the individual asset or index.

Theoretically, investors can choose from infinitely many different portfolios by combining any of the 500 assets with arbitrary weights for each asset. In our simulations, however, we restrict portfolios to six different types of index portfolios and to randomly generated pairs trades. This is a limitation of our simulation environment. For index portfolios, we construct value-weighted and equal-weighted portfolios of the market index, “size” indices, and “industry” indices. “Size” is defined as expected dollar volume.<sup>23</sup> “Industry” indexes are defined by arbitrarily grouping stocks so that the number of stocks and distribution of size do not vary across industries. A large proportion of index trading is the value-weighted market index (75%), reflecting its high volume in practice. Pairs trades randomly buy either an asset or an index portfolio and sell an equal expected dollar value of another random asset or index.

Limit prices are distributed around an arbitrary initial price, normalized to \$100 per share or index unit. This is also the price at which the exchange trades a zero quantity.<sup>24</sup> For individual assets and index portfolios, the midpoint between upper and lower limit prices has a lognormal distribution centered at \$97.00 for buy orders and \$103.00 for sell orders, with an arbitrary log-standard-deviation of 10%. The expected difference between upper and lower limit prices is assumed to be very small, one basis point (i.e.,  $p_i^H = \$100.005$ ,  $p_i^L = \$99.995$ ), with a very large log-variance of 2.0. Orders have equal probabilities of buying or selling the given individual asset or portfolio.

These assumptions are realistic because liquidity and trading volume vary enormously across stocks, market indexes (like the S&P 500 E-mini futures contract or the SPDR ETF) have greater liquidity than any single stock, and long-short trading is widely

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<sup>22</sup>A log-standard-deviation of 1.7 means that a plus-or-minus one standard deviation change in the log of a random quantity multiplies or divides the random quantity by  $e^{1.7} \approx 5.47$ .

<sup>23</sup>The simulation environment has no concept of market capitalization from which to define size. If it is assumed that all stocks have the same expected turnover rate of unmodeled market capitalization, then market capitalization is perfectly correlated with expected dollar volume.

<sup>24</sup>The simulations are structured so that normalizing prices scales prices and quantities but does not otherwise affect the algorithm (e.g., dollar values of all orders and trades are unaffected by this scaling).

Description	Base	Low	High
Number of assets	500	.	.
Number of orders	100000	.	.
Slope of exchange's demand schedule (shares traded per dollar price change at \$100/share)	0.0100	.	.
Fraction of orders for individual assets	0.5000	0.0500	0.9500
Fraction of orders for indexes among orders for portfolios	0.5000	0.0500	0.9500
Number of size indexes	5	2	50
Number of industry indexes	10	2	50
Probability an index order is a market index order	0.8000	0.0500	0.9500
Probability a size or industry index order is a size index order	0.5000	0.0500	0.9500
Probability a mkt index order is an EW mkt index order	0.0625	0.0500	0.9500
Probability a size index order is an EW size index order	0.2500	0.0500	0.9500
Probability an industry index order is an EW industry index order	0.2500	0.0500	0.9500
Standard deviation of expected number of orders across assets	1.7000	0.1000	3.0000
Standard deviation of order size given asset	1.5000	0.1000	3.0000
Standard deviation of upper limit price as fraction of initial price	0.1000	0.0100	1.0000
Mean deviation of upper limit price as fraction of initial price standard deviation	0.3000	0.0100	1.0000
Mean difference between upper and lower limit prices (basis points)	1.0000	0.0100	100.0000
Standard deviation of difference between upper and lower limit prices	2.0000	0.1000	3.0000
Fraction buy orders for indexes and assets	0.5000	0.1000	0.9500

Table 2: Parameters for simulating an order book.

practiced. These assumptions also make the problem algorithmically difficult because huge variation in liquidity across assets and portfolios makes the liquidity matrix very poorly conditioned, and high-volume index trading makes the liquidity matrix highly non-diagonal. Further, huge variation in order size and the tiny difference between upper and lower limit prices stress the algorithm by making the liquidity matrix change a great deal when prices change by small amounts.

In addition to the base-case simulation parameters described above, we also test the robustness of the algorithm by using low and high values of parameters. Table 2 lists base-case, low, and high values for the parameters. Further details on the simulation methodology are provided in Appendix B.

### 5.2.2 Computation Outcomes

When performed on an ordinary office workstation—an AMD Ryzen Threadripper 3960X processor, 24 cores running at 3.8GHz, and 128GB of memory running at 3600MHz; RTX 2070 gpu at 1710 MHz with 8 GB of RAM—computation of market-clearing prices and quantities takes about 0.1451 seconds (median) in the base-case scenario with 500 assets and 100,000 orders. Our results are obtained using the gpu and two cores.<sup>25</sup> Un-

<sup>25</sup>Computation times do not change much when more cores are used. This is probably because easily parallelized computations are done on the gpu, and other calculations do not benefit from using multiple

cleared quantities are near zero, equal to 8.7 dollars per trillion dollars of total volume.<sup>26</sup>

The amount of exchange trading is small. On average, the exchange trades 3.2 dollars per million dollars of trading volume. Across 51 repetitions, the maximum, minimum, and standard deviation of exchange trading are 5.99, 2.32, and 0.73 dollars per million dollars. In practice, we expect the exchange to be able to avoid accumulating significant inventories by adjusting its base prices over time.

Exchange trading, while small, has a significant effect on the cross-sectional standard deviation of market-clearing prices for assets with thin order books. Without exchange trading, assets with thin order books have essentially indeterminate prices. The algorithm arbitrarily chooses prices of these assets among multiple clearing prices. This drives the standard deviation of price changes to an immense value of 14.4 million percent. The small amount of exchange trading used in the simulations brings the standard deviation of prices down to a much more reasonable 14.19%. In practice, we expect market-making firms to provide liquidity in thinly traded stocks and stabilize prices.

Figure 2 describes how computation times vary with the number of assets and the number of orders. In the first panel, as the number of orders increases from 100,000 to 1,000,000 and 10,000,000, while keeping the number of assets constant, computation times increase from 0.1451 to 0.5639 and 4.67 seconds. The computation time crosses one second with approximately 1,930,000 orders. When the number of orders is large, computation time is approximately proportional to the number of orders. In the second panel, as the number of assets increases from 500 to 2,000 and 10,000, again keeping the number of orders constant, computation times increase to 1.1021 and 56.3 seconds. The computation time crosses one second with 1,800 assets and ten seconds with 5,200 assets. The increased computation times when the number of assets increases are mainly due to the computation costs of constructing the liquidity matrix input to the Cholesky decomposition and the Cholesky decomposition itself (which is an  $O(N^3)$  algorithm in the number of assets).<sup>27</sup>

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cores. The computation times are stable across 401 repetitions, with a maximum of 0.1603 seconds, a minimum of 0.1365 seconds, and a standard deviation of 0.0058 seconds.

<sup>26</sup>All calculations are done with 64-bit floating-point numbers. If calculations are done with 32-bit floating-point numbers, computation time is more than twice as fast, but uncleared quantities are typically much larger.

<sup>27</sup>Both figures are almost flat initially. With a small number of orders or assets, the overhead associated with the Python interpreter becomes a significant fraction of computation times. When there are only 10 assets and 20 orders, the computation time is about 0.0552 seconds, which we believe is likely a good

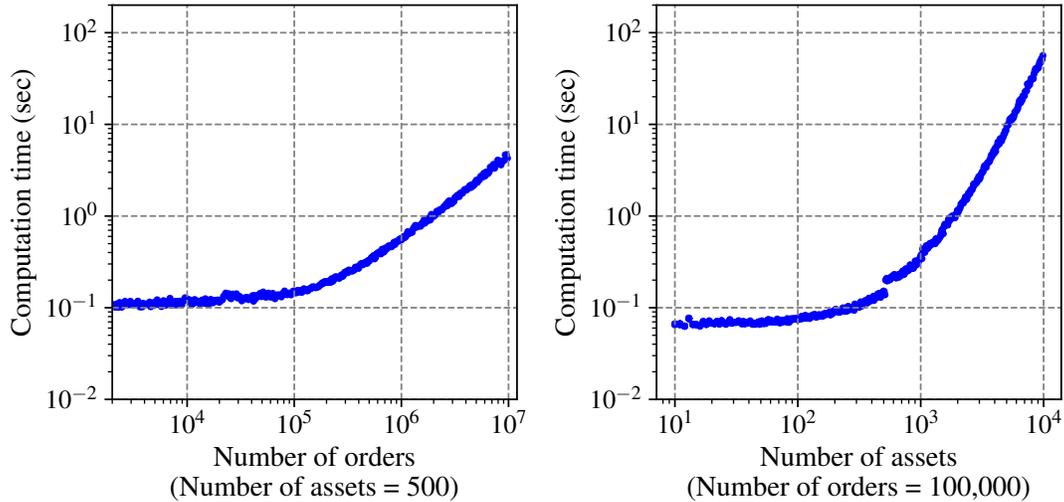


Figure 2: Computation Time As a Function of the Number of Orders and the Number of Assets

Panel A varies the number of orders. Panel B varies the number of assets. In both panels, all other parameters are set to their base-case values. Each dot represents one simulated order book, and there are approximately 500 simulations in each panel. The small discontinuity in Panel B around 600 assets likely is a hardware artifact, such as the need to use RAM rather than cache for sufficiently large problems.

For robustness, we alter each parameter's value to the minimum and the maximum of a wide range, as described in Table 2, while keeping the number of orders, the number of assets, and the slope of exchange trading constant. Computation times remain of the same order of magnitude (0.1159 to 0.2655 seconds compared to 0.1459 seconds in the base-case setting). Most parameters have a modest effect on computation times except for the standard deviation of order size and the fraction of buy orders. These two parameters affect the balance of the supply and demand of the order book. Changing the standard deviation of order size from 1.5 to 3 increases computation time to 0.2078 seconds. Changing the fraction of buy orders from 0.5 to 0.1 increases computation time to 0.2344 seconds. Extreme values for these parameters make the order book more asymmetric, which in turn makes the problem more difficult to solve.

While having little effect on computation times, the difference between upper and lower limit prices significantly affects the quality of market clearing. The low mean difference scenario (0.01 basis points) and the high standard deviation scenario (3.00) increase the amount of uncleared quantities from 8.7 dollars per trillion to 120 and 160 estimate of the overhead associated with the Python interpreter.

dollars per trillion. Further making the mean difference ten times smaller makes uncleared quantities ten times larger. This occurs because as the upper and lower limit prices become closer ( $p_i^H \rightarrow p_i^L$ ), the upper limit price also becomes closer to the market-clearing price ( $p_i^H \rightarrow p_i$ ) for all executable orders. The ratio between the two differences ( $(p_i^H - p_i)/(p_i^H - p_i^L)$ ), each of which approaches zero, becomes numerically inaccurate. This makes the trade rate in equation (3)—and thus market-clearing quantities—inaccurate and increases uncleared quantities.

Finally, we consider an extreme scenario by setting all parameters simultaneously to those that increase computation times (either the minimum or the maximum of the range depending on the parameters). In this case, the computation time increases to 0.4291 seconds, approximately a factor of three relative to the base case and still below half a second, and the uncleared quantities increase to 1.5 dollars per million of total volume. The reason uncleared quantities increase so much in this extreme scenario, relative to the base case, is that the combination of a small mean difference between the upper and lower limit prices and a high standard deviation of order sizes makes some demands very close to a step function, creating numerical error. While 1.5 dollars per million is still arguably small as an amount of inaccuracy, it may be prudent to adopt a lower bound for the difference between the upper and lower limit prices, such as one basis point.

**Discussion** Overall, market-clearing prices and quantities are computed quickly and accurately with minimal trading by the exchange. Computation times grow with the numbers of orders and assets, as expected. Reassuringly, the growth with the number of orders appears to be linear, and problems with several thousand assets can be solved in about one to ten seconds on an ordinary workstation. We interpret these results as an initial computational proof of concept for the flow trading market design.

In a production environment, we expect more powerful computers and more refined algorithms will make it easier to calculate market-clearing prices and quantities with even greater speed. Future algorithms may be better able to take advantage of parallel processing across more cores and take advantage of advances in quadratic programming and sparse matrix multiplications, which play key roles in our computation and are active areas of research in computer science.

## 6 Microfoundation for Flow Portfolio Demands

Flow portfolio demands are demands per batch auction in portfolio units as piecewise-linear and downward-sloping functions of portfolio prices (equation (2)). This language, while more general than standard limit orders, is restrictive in that a market participant's demand for each asset generally depends on the prices of all assets. Section 6.1 provides a microfoundation for the language in a CARA-normal framework. Section 6.2 describes how the logic extends to general preferences and discusses limitations of our approach.

### 6.1 The Static CARA-Normal Framework

The CARA-normal model (Grossman (1976), Grossman and Stiglitz (1980), Admati (1985)), in which agents have constant absolute risk aversion (CARA) and asset returns are joint-normally distributed, is widely used in economics and finance. We use the CARA-normal model to study whether flow portfolio demands can be used to express traders' optimal demands. Although the model is static, we interpret the static optimal demands as optimal demands per batch. Several models that study dynamic strategic trading in the CARA-normal environment (Vayanos (1999), Du and Zhu (2017), Kyle, Obizhaeva, and Wang (2018), Sannikov and Skrzypacz (2016)) show that trading gradually over time is optimal to manage price impact. While these models focus on the case of a single risky asset, we conjecture that the insights would carry over to the trade of portfolios.

Assume there are  $N$  risky assets and one safe asset, whose return is normalized to one. Assume there is a single trader who subjectively believes that the risky assets' payoffs, denoted by vector  $\mathbf{v}$ , are joint-normally distributed with mean  $\mathbf{m}$  and covariance matrix  $\mathbf{\Sigma}$ . The trader has CARA preferences with risk aversion parameter  $A$ . Since there are no wealth effects with CARA preferences, we set the trader's wealth to zero for simplicity.

Consider the trader's optimization problem given a fixed, known set of prices—let  $\boldsymbol{\pi}$  denote the vector of prices for the  $N$  risky assets. Assume that the trader is a perfect competitor who cannot affect these prices with their trading; we will discuss the case where the trader has price impact shortly. The trader's portfolio optimization problem,

given her beliefs, risk preferences, and prices, is given by

$$\max_{\boldsymbol{\omega}} \mathbb{E} \left[ -\exp^{-A(\mathbf{v}-\boldsymbol{\pi})^\top \boldsymbol{\omega}} \right]. \quad (24)$$

Joint normality allows us to transform the above into the quadratic optimization problem:

$$\max_{\boldsymbol{\omega}} \left[ (\mathbf{m}-\boldsymbol{\pi})^\top \boldsymbol{\omega} - \frac{1}{2} A \boldsymbol{\omega}^\top \boldsymbol{\Sigma} \boldsymbol{\omega} \right]. \quad (25)$$

The first order condition implies that the optimal portfolio is given by

$$\boldsymbol{\omega} = (A \boldsymbol{\Sigma})^{-1} (\mathbf{m}-\boldsymbol{\pi}). \quad (26)$$

Observe that the optimal demand for each asset depends on its covariance with the other assets, via the associated row of the inverse covariance matrix, and the entire vector  $\mathbf{m}-\boldsymbol{\pi}$ . Thus, as is well known, demand for each asset generally depends on the prices of all assets.

**Implementing the Optimum with Flow Portfolio Demands** If the prices  $\boldsymbol{\pi}$  are known and fixed, the trader can implement their optimum as defined in equation (26) with a single flow portfolio demand with portfolio weights  $\mathbf{w}_i = \boldsymbol{\omega}$ , maximum rate  $q_i = 1$ , and any limit prices with  $p_i^H > p_i^L > \boldsymbol{\pi}^\top \mathbf{w}_i$  such that the order is fully executable at the known prices.

Now consider the (more realistic) case where the trader does not know the exact market-clearing prices in advance. Predicting the exact market-clearing prices is especially difficult when prices are rapidly fluctuating over time. To implement the optimal demand, the trader must therefore make their quantity traded a function of unknown prices  $\boldsymbol{\pi}$ . Equation (26) specifies a linear demand curve in which the demand for asset  $i$  is a linear function of the price of some arbitrary portfolio (the  $i$ th row of the matrix  $\boldsymbol{\Sigma}^{-1}$ ). These demands are not expressed in a form consistent with our flow portfolio demands because the demands are not functions of the price of the asset itself and may not even be downward sloping.

Next, we show that traders can nevertheless implement their optimum according to equation (26) with flow portfolio demands, without any knowledge of prices. To do this, we use a singular value decomposition to rotate the asset space so that the optimal

demand is for a combination of portfolios where the number of units of each portfolio demanded is a downward-sloping linear function of the price of the portfolio itself. Note that although we require flow portfolio demands to be piecewise linear, not linear, the two can be made practically equivalent by setting the range between upper and lower limit prices very wide.

Every matrix  $\Sigma$  has a singular value decomposition of the form  $\Sigma = \mathbf{U}\Delta\mathbf{V}^\top$ , where  $\mathbf{U}$  and  $\mathbf{V}$  are matrices with orthonormal rows and  $\Delta$  is a diagonal matrix. If the matrix is symmetric, then  $\mathbf{U} = \mathbf{V}$ ; if the matrix is positive semidefinite, then all of the diagonal elements of  $\Delta$  are positive. Since the covariance matrix  $\Sigma$  is positive semidefinite (symmetric), its singular value decomposition therefore has the form

$$\Sigma = \mathbf{U}\Delta\mathbf{U}^\top, \quad (27)$$

where  $\mathbf{U}$  is an orthonormal matrix, and  $\Delta$  is a diagonal matrix with positive elements. Let  $K \leq N$  denote the rank of  $\Sigma$ , let  $\delta_i$  denote the  $i$ th nonzero diagonal entry of  $\Delta$ , and let  $\mathbf{u}_i$  denote the corresponding column of  $\mathbf{U}$ .<sup>28</sup> Then we have

$$\Sigma^{-1} = \sum_{i=1}^K \frac{1}{\delta_i} \mathbf{u}_i \mathbf{u}_i^\top. \quad (28)$$

Using this, we can express the optimal portfolio in equation (26) as

$$\boldsymbol{\omega} = \sum_{i=1}^K \left( \frac{\mathbf{u}_i^\top \mathbf{m} - \mathbf{u}_i^\top \boldsymbol{\pi}}{A \delta_i} \right) \mathbf{u}_i. \quad (29)$$

The right hand side of this equation is a linear combination of demand curves for portfolios of assets, where  $\mathbf{u}_1, \dots, \mathbf{u}_K$  are the portfolios, and the scalar quantity

$$\frac{1}{A \delta_i} (\mathbf{u}_i^\top \mathbf{m} - \mathbf{u}_i^\top \boldsymbol{\pi}) \quad (30)$$

is the number of units of portfolio  $\mathbf{u}_i$  demanded. The quantities  $\delta_i$ ,  $\mathbf{u}_i^\top \mathbf{m}$ , and  $\mathbf{u}_i^\top \boldsymbol{\pi}$  correspond to the variance, the expected payoff, and the price of the portfolio  $\mathbf{u}_i$ . Since the demand for each portfolio only depends on the portfolio's price, traders can achieve the

<sup>28</sup>When  $K$  is strictly less than  $N$  (i.e., the matrix  $\Sigma$  is positive semidefinite but not positive definite), we can use the pseudo-inverse instead of the inverse to define the demand curve.

optimal trade in equation (26) by using  $K$  demand curves for portfolios, each of which is a downward-sloping linear function of that portfolio's price ( $\mathbf{u}_i^\top \boldsymbol{\pi}$ ). The demand curve is linear due to CARA-normal assumptions, it is a function of the price of the portfolio because the covariance matrix  $\boldsymbol{\Sigma}$  is symmetric (so that  $\mathbf{U} = \mathbf{V}$  diagonalizes  $\boldsymbol{\Sigma}$ ), and it is downward sloping because the covariance matrix is positive semidefinite (which makes  $\delta_i$  positive).

The theorem below summarizes the results.

**Theorem 4.** *Consider a static CARA-normal framework in which a trader believes that the covariance matrix of the asset payoffs has rank  $K$ . Then the trader's optimal demand (equation (26)) can be represented as the sum of  $K$  downward-sloping demand curves for portfolios, each of which depends only on that portfolio's price (equation (29)).*

**Practical Implementation** We can decompose the expected utility from the optimal portfolio into the contribution of each rotated asset. Substituting the optimal portfolio in equation (29) into equation (25), and some algebraic manipulations (see details in Appendix D), allows us to express the expected utility (certainty equivalent) from trading at prices  $\boldsymbol{\pi}$  as

$$\sum_{i=1}^K \frac{1}{2A} \left( \frac{\mathbf{u}_i^\top \mathbf{m} - \mathbf{u}_i^\top \boldsymbol{\pi}}{\sqrt{\delta_i}} \right)^2. \quad (31)$$

This formula shows that the benefit of each portfolio is determined by its squared Sharpe ratio as perceived by the trader.<sup>29</sup> In practice, rather than trading all  $K$  portfolios, traders may select only those portfolios which they perceive to have sufficiently high squared Sharpe ratios.

**Price Impact and Strategic Trading** Thus far, we have assumed that traders are perfect competitors, behaving as if they have no price impact. In practice, trades can move prices. Many institutional traders dedicate considerable time and resources to managing price impact. Now we show that flow portfolio demands can still be used to implement the optimal demands when traders behave strategically, taking into account their price impact.

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<sup>29</sup>Recall, the Sharpe ratio refers to the risk premium (i.e., the expected return minus risk-free rate) divided by the standard deviation. Here, the risk-free rate is zero since the safe asset's return is normalized to one.

Following the literature (Kyle (1989)), we assume that traders believe that their price impact is linear in the quantity they trade. We further assume that the price impact matrix is positive semidefinite.<sup>30</sup> Positive semidefiniteness of the price impact matrix means that buying more of a portfolio increases the portfolio's price or leaves its price unchanged. That is, for each trader, there is an  $N \times N$  positive semidefinite matrix  $\mathbf{\Lambda}$ , such that

$$\boldsymbol{\pi} = \boldsymbol{\pi}_0 + \mathbf{\Lambda} \boldsymbol{\omega}, \quad (32)$$

where  $\boldsymbol{\pi}_0$  is the vector of hypothetical prices that would prevail if the trader were not to trade, and the  $n$ th row of  $\mathbf{\Lambda}$  corresponds to the marginal impact of trading assets 1 to  $N$  on the price of asset  $n$ .

With price impact, the trader's optimal strategy is a slight modification of the competitive solution in equation (26), given by

$$\boldsymbol{\omega} = (\mathbf{A}\boldsymbol{\Sigma} + \mathbf{\Lambda})^{-1}(\mathbf{m} - \boldsymbol{\pi}). \quad (33)$$

Again, we can use singular value decomposition to rotate the asset space such that the optimal portfolio can be implemented by combining flow portfolio demands that only depend on the portfolio's price. The number of required flow portfolio demands corresponds to the rank of  $\mathbf{A}\boldsymbol{\Sigma} + \mathbf{\Lambda}$ . Both the covariance matrix and the price impact matrix  $\mathbf{\Lambda}$  are positive semidefinite. Since the sum of two positive semidefinite matrices is also positive semidefinite,  $\mathbf{A}\boldsymbol{\Sigma} + \mathbf{\Lambda}$  is positive semidefinite. Therefore, the demand curve for each portfolio is downward sloping.

**Theorem 5.** *Consider a static CARA-normal framework in which a trader believes that her price impact is linear and positive semidefinite (equation (32)). Then the strategic trader's optimal portfolio (equation (33)) can be represented as the sum of downward-sloping demand curves for portfolios, each of which depends only on that portfolio's price.*

Recall, when proving the existence and uniqueness of market-clearing prices and quantities in Section 4, we treat orders as if they represent traders' true valuations. This simplification does not imply that we can infer traders' valuations from their orders.

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<sup>30</sup>Malamud and Rostek (2017) show that when the covariance matrix is the same for all traders, each trader's equilibrium price impact matrix is proportional to the covariance matrix, which implies that all price impact matrices are positive semidefinite. It is left for future study to determine under what conditions the price impact matrix is positive semidefinite in a more general setting.

Strategic trading is an important reason that there often is a gap between true and as-bid valuations.

## 6.2 Approximations for General Preferences and Limitations

We can use the logic above to show that for any strictly concave, twice continuously differentiable quasi-linear preference, the optimal demand can be locally approximated with a combination of downward-sloping linear demand curves for portfolios, each of which depends only on that portfolio's price.

Suppose a trader has quasi-linear preferences  $u(\boldsymbol{\omega}) + m$ , where  $u(\boldsymbol{\omega})$  is utility over assets and  $m$  is money. Then the optimal demand is given by the first order condition ( $u'(\boldsymbol{\omega}) = \boldsymbol{\pi}$ ), and the demand for each asset generally depends on all prices. Since  $u(\boldsymbol{\omega})$  is strictly concave and twice continuously differentiable, the optimal demand is continuously differentiable. We can use a Taylor series to linearly approximate the optimal demand at market-clearing prices  $\boldsymbol{\pi}$  around a given set of prices  $\boldsymbol{\pi}_0$  (for example, the prices at the previous period) as

$$\boldsymbol{\omega}(\boldsymbol{\pi}) = \boldsymbol{\omega}(\boldsymbol{\pi}_0) + \frac{\partial \boldsymbol{\omega}}{\partial \boldsymbol{\pi}}(\boldsymbol{\pi} - \boldsymbol{\pi}_0), \quad \text{with} \quad \frac{\partial \boldsymbol{\omega}}{\partial \boldsymbol{\pi}} = u''(\boldsymbol{\omega})^{-1}, \quad (34)$$

where  $\partial \boldsymbol{\omega} / \partial \boldsymbol{\pi}$  is a matrix whose  $(i, j)$ th element is the derivative of the optimal demand for the  $i$ th asset with respect to the price of the  $j$ th asset.

Since there is no wealth effect with quasi-linear preferences and  $u(\boldsymbol{\omega})$  is strictly concave, the matrix  $\partial \boldsymbol{\omega} / \partial \boldsymbol{\pi}$  is negative semidefinite (Slutsky symmetry). Thus, we can use a singular value decomposition to diagonalize the matrix as in equation (27). This implies that, as in equation (28), there exist column vectors  $\mathbf{u}_1, \dots, \mathbf{u}_K$  and strictly negative values  $\delta_1, \dots, \delta_K$ , where  $K$  is the rank of the matrix  $\partial \boldsymbol{\omega} / \partial \boldsymbol{\pi}$ , such that

$$\frac{\partial \boldsymbol{\omega}}{\partial \boldsymbol{\pi}} = \sum_{i=1}^K \delta_i \mathbf{u}_i \mathbf{u}_i^\top. \quad (35)$$

Using this, we can express the optimal demand in equation (34) as

$$\boldsymbol{\omega}(\boldsymbol{\pi}) = \boldsymbol{\omega}(\boldsymbol{\pi}_0) + \sum_{i=1}^K (\delta_i \mathbf{u}_i^\top (\boldsymbol{\pi} - \boldsymbol{\pi}_0)) \cdot \mathbf{u}_i. \quad (36)$$

Hence, the optimal demand is expressed as a linear combination of demands for  $K + 1$  portfolios: the optimal portfolio at fixed prices  $\boldsymbol{\pi}_0$  and  $K$  orthogonal portfolios  $\mathbf{u}_1 \dots \mathbf{u}_K$ . Importantly, the optimal demand for each of the  $K$  portfolios is a linear downward-sloping demand curve that depends only on the price of that portfolio ( $\mathbf{u}_i^\top \boldsymbol{\pi}$ ). It is downward-sloping because  $\delta_k$  is strictly negative, which follows from negative semidefiniteness of the matrix  $\partial\boldsymbol{\omega}/\partial\boldsymbol{\pi}$ .

**Limitations** There are limitations to our approach. First, since the Taylor series approximates a potentially nonlinear demand locally, traders need to replace an old Taylor series approximation with a new one when price volatility makes the old Taylor series approximation sufficiently inaccurate. This requires canceling old orders and replacing them with new ones. Second, when there is asymmetric information, the optimal demand for portfolios may depend on other portfolios' prices through learning from prices. As a result of learning, the matrix  $\partial\boldsymbol{\omega}/\partial\boldsymbol{\pi}$  may not be symmetric or negative semidefinite. Lastly, if preferences are not quasilinear and exhibit income or wealth effects, the matrix  $(\partial\boldsymbol{\omega}/\partial\boldsymbol{\pi})$  is also not necessarily symmetric or negative semidefinite. When it is not negative semidefinite and symmetric, it may not be possible to find portfolios such that the demand is a function of the portfolio's price and the demand is downward sloping.

## 7 Conclusion

This paper has introduced a new market design for trading financial assets, such as stocks, bonds, futures, and currencies. It introduces a simple language for trading portfolios of assets and combines it with continuous-scaled limit orders from Kyle and Lee (2017) and frequent batch auctions from Budish, Cramton, and Shim (2015). Technical foundations for the proposed market design include existence and uniqueness results, computational results, and microfoundations for our approach to trading portfolios.

The combination of continuous-scaled limit orders and frequent batch auctions yields a market design in which time is discrete, and prices and quantities are continuous. The status quo market design has these reversed. As has been widely documented, treating time as a continuous variable and imposing discreteness on prices and quantities causes significant complexity, inefficiency, and rent seeking in modern financial markets. See

Appendix A for discussion of several practical implementation details and policy issues related to our proposal.

Our proposed language for trading portfolios is, on the one hand, rich enough to allow traders to directly express many important kinds of trading demands—customized ETFs, pairs trades, general long-short strategies, general market-making strategies, all with tunable urgency—while also allowing for guaranteed existence and uniqueness of market-clearing prices and quantities and their fast computation. This seems a useful new point on the frontier of language design, which offers an attractive tradeoff between expressiveness and computability.

## References

- Admati, Anat R.** 1985. “A noisy rational expectations equilibrium for multi-asset securities markets.” *Econometrica*, 629–657.
- Antill, Samuel, and Darrell Duffie.** 2020. “Augmenting markets with mechanisms.” *Review of Economic Studies*, 88(4): 1665–1719.
- Aquilina, Matteo, Eric Budish, and Peter O’Neill.** 2022. “Quantifying the high-frequency trading ‘arms race.’” *Quarterly Journal of Economics*, 137(1): 493–564.
- Arrow, Kenneth J., and Gerard Debreu.** 1954. “Existence of an equilibrium for a competitive economy.” *Econometrica*, 1: 265–290.
- Baldwin, Elizabeth, and Paul Klemperer.** 2019. “Understanding preferences: ‘Demand types’, and the existence of equilibrium with indivisibilities.” *Econometrica*, 87(3): 867–932.
- Bertsekas, Dimitri P.** 2009. *Convex optimization theory*. Athena Scientific Belmont.
- Bichler, Martin.** 2017. *Market design: A linear programming approach to auctions and matching*. Cambridge University Press.
- Black, Fischer.** 1971. “Toward a fully automated exchange, Part I.” *Financial Analysts Journal*, 27: 29–34.
- Bloomberg Insights.** 2021. “U.S. institutional equity trading commissions jump 25% to \$8.9bn in 2021, according to bloomberg intelligence.” Retrieved June 8, 2022 from <https://bloom.bg/303M44E>.
- Boyd, Stephen, and Lieven Vandenbergh.** 2004. *Convex optimization*. Cambridge University Press.
- Budish, Eric, and Judd B. Kessler.** 2022. “Can market participants report their preferences accurately (enough)?” *Management Science*, 68(2): 1107–1130.
- Budish, Eric, Gérard P Cachon, Judd B Kessler, and Abraham Othman.** 2017. “Course match: A large-scale implementation of approximate competitive equilibrium from equal incomes for combinatorial allocation.” *Operations Research*, 65(2): 314–336.

- Budish, Eric, Peter Cramton, and John Shim.** 2015. “The high-frequency trading arms race: Frequent batch auctions as a market design response.” *Quarterly Journal of Economics*, 130(4): 1547–1621.
- Budish, Eric, Robin Lee, and John Shim.** 2021. “Will the market fix the market? A theory of stock exchange competition and innovation.” University of Chicago Working Paper.
- Cespa, Giovanni.** 2004. “A comparison of stock market mechanisms.” *RAND Journal of Economics*, 803–823.
- Chao, Yong, Chen Yao, and Mao Ye.** 2017. “Discrete pricing and market fragmentation: A tale of two-sided markets.” *American Economic Review*, 107(5): 196–99.
- Chao, Yong, Chen Yao, and Mao Ye.** 2019. “Why discrete price fragments U.S. stock exchanges and disperses their fee structures.” *Review of Financial Studies*, 32(3): 1068–1101.
- Chen, Daniel, and Darrell Duffie.** 2021. “Market fragmentation.” *American Economic Review*, 111(7): 2247–74.
- Cramton, Peter.** 2017. “Electricity market design.” *Oxford Review of Economic Policy*, 33(4): 589–612.
- Cramton, Peter, Yoav Shoham, and Richard Steinberg,** ed. 2006. *Combinatorial auctions*. MIT Press.
- Daskalakis, Constantinos, Paul W. Goldberg, and Christos H. Papadimitriou.** 2009. “The complexity of computing a Nash equilibrium.” *SIAM Journal on Computing*, 39(1): 195–259.
- Demange, Gabrielle, David Gale, and Marilda Sotomayor.** 1986. “Multi-item auctions.” *Journal of Political Economy*, 94(4): 863–872.
- Du, Songzi, and Haoxiang Zhu.** 2017. “What is the optimal trading frequency in financial markets?” *Review of Economic Studies*, 84(4): 1606–1651.
- Fama, Eugene F.** 1970. “Efficient capital markets: A review of theory and empirical work.” *Journal of Finance*, 25(2): 383–417.

- Gondzio, Jacek.** 2012. "Interior point methods 25 years later." *European Journal of Operational Research*, 218: 587–601.
- Grossman, Sanford.** 1976. "On the efficiency of competitive stock markets where trades have diverse information." *Journal of Finance*, 31(2): 573–585.
- Grossman, Sanford J., and Joseph E. Stiglitz.** 1980. "On the impossibility of informationally efficient markets." *American Economic Review*, 70(3): 393–408.
- Gul, Faruk, and Ennio Stacchetti.** 1999. "Walrasian equilibrium with gross substitutes." *Journal of Economic theory*, 87(1): 95–124.
- Hatfield, John William, and Paul R. Milgrom.** 2005. "Matching with contracts." *American Economic Review*, 95(4): 913–935.
- Hatfield, John William, Scott Duke Kominers, Alexandru Nichifor, Michael Ostrovsky, and Alexander Westkamp.** 2013. "Stability and competitive equilibrium in trading networks." *Journal of Political Economy*, 121(5): 966–1005.
- Hatfield, John William, Scott Duke Kominers, and Alexander Westkamp.** 2021. "Stability, strategy-proofness, and cumulative offer mechanisms." *Review of Economic Studies*, 88(3): 1457–1502.
- Indriawan, Ivan, Roberto Pascual, and Andriy Shkilko.** 2022. "On the effects of continuous trading." Available at SSRN: <https://ssrn.com/abstract=3707154>.
- Kelso, Alexander S., and Vincent P. Crawford.** 1982. "Job matching, coalition formation, and gross substitutes." *Econometrica*, 1483–1504.
- Klemperer, Paul.** 2004. *Auctions: Theory and practice*. Princeton University Press.
- Klemperer, Paul.** 2010. "The product-mix auction: A new auction design for differentiated goods." *Journal of the European Economic Association*, 8(2-3): 526–536.
- Kyle, Albert S.** 1985. "Continuous auctions and insider trading." *Econometrica*, 1315–1335.
- Kyle, Albert S.** 1989. "Informed speculation with imperfect competition." *Review of Economic Studies*, 56(3): 317–355.

- Kyle, Albert S., and Anna A. Obizhaeva.** 2016. "Market microstructure invariance: Empirical hypotheses." *Econometrica*, 84(4): 1345–1404.
- Kyle, Albert S, and Jeongmin Lee.** 2017. "Toward a fully continuous exchange." *Oxford Review of Economic Policy*, 33(4): 650–675.
- Kyle, Albert S, Anna A Obizhaeva, and Yajun Wang.** 2018. "Smooth trading with overconfidence and market power." *Review of Economic Studies*, 85(1): 611–662.
- Lahaie, Sebastien M., and David C. Parkes.** 2004. "Applying learning algorithms to preference elicitation." *Proceedings of the 5th ACM Conference on Electronic Commerce*, 180–188.
- Leyton-Brown, Kevin, Paul Milgrom, and Ilya Segal.** 2017. "Economics and computer science of a radio spectrum reallocation." *Proceedings of the National Academy of Sciences*, 114(28): 7202–7209.
- Lintner, John.** 1965. "Security prices, risk, and maximal gains from diversification." *Journal of Finance*, 20(4): 587–615.
- Li, Sida, Xin Wang, and Mao Ye.** 2021. "Who provides liquidity, and when?" *Journal of Financial Economics*.
- Malamud, Semyon, and Marzena Rostek.** 2017. "Decentralized exchange." *American Economic Review*, 107(11): 3320–62.
- Markowitz, Harry.** 1952. "Portfolio selection." *Journal of Finance*, 7(1): 77–91.
- Mas-Colell, Andreu, Michael Dennis Whinston, and Jerry R. Green.** 1995. *Microeconomic theory*. Vol. 1, Oxford University Press, New York.
- McKenzie, Lionel W.** 1959. "On the existence of general equilibrium for a competitive market." *Econometrica*, 54–71.
- Mehrotra, S.** 1992. "On the implementation of a primal-dual interior point method." *SIAM Journal on Optimization*, 2(4): 575–601.
- Milgrom, Paul.** 2000. "Putting auction theory to work: The simultaneous ascending auction." *Journal of Political Economy*, 108(2): 245–272.

- Milgrom, Paul.** 2004. *Putting auction theory to work*. Cambridge University Press.
- Milgrom, Paul.** 2009. "Assignment messages and exchanges." *American Economic Journal: Microeconomics*, 1(2): 95–113.
- Milgrom, Paul, and Ilya Segal.** 2017. "Designing the US incentive auction." In *Handbook of spectrum auction design*, ed. Martin Bichler and Jacob K Goeree. Cambridge University Press.
- Nesterov, Yurii.** 2004. *Introductory lectures on convex optimization: A basic course*. Kluwer Academic Publishers.
- Ostrovsky, Michael.** 2008. "Stability in supply chain networks." *American Economic Review*, 98(3): 897–923.
- Parkes, David C., and Sven Seuken.** 2018. *Economics and computation*. Cambridge University Press.
- Ross, Stephen A.** 1976. "The arbitrage theory of capital asset pricing." *Journal of Economic Theory*, 13(3): 341–360.
- Rostek, Marzena, and Ji Hee Yoon.** 2020. "Equilibrium theory of financial markets: Recent developments." *Journal of Economic Literature*.
- Rostek, Marzena, and Ji Hee Yoon.** 2021. "Exchange design and efficiency." *Econometrica*, 89(6): 2887–2928.
- Rostek, Marzena J., and Ji Hee Yoon.** 2022. "Innovation in decentralized markets." Available at SSRN: <https://ssrn.com/abstract=3964916>.
- Roth, Alvin E.** 2002. "The economist as engineer: Game theory, experimentation, and computation as tools for design economics." *Econometrica*, 70(4): 1341–1378.
- Sandholm, Tuomas, and Craig Boutilier.** 2006. "Preference elicitation in combinatorial auctions." In *Combinatorial auctions*, ed. Peter Cramton, Yoav Shoham and Richard Steinberg, Chapter 10. MIT Press.
- Sannikov, Yuliy, and Andrzej Skrzypacz.** 2016. "Dynamic trading: Price inertia and front-running." Working paper.

- Scarf, Herbert E., and Terje Hansen.** 1973. *The computation of economic equilibria*. Yale University Press.
- Schwartz, Robert A.** 2001. *The electronic call auction: Market mechanism and trading: Building a better stock market*. Vol. 7, Springer Science & Business Media.
- Shapley, Lloyd S, and Martin Shubik.** 1971. “The assignment game I: The core.” *International Journal of Game Theory*, 1(1): 111–130.
- Sharpe, William F.** 1964. “Capital asset prices: A theory of market equilibrium under conditions of risk.” *Journal of Finance*, 19(3): 425–442.
- Tobin, James.** 1958. “Liquidity preference as behavior towards risk.” *The Review of Economic Studies*, 25(2): 65–86.
- Tyc, Stephane.** 2014. “A technological solution to best execution and excessive market complexity.” *Quincy Data, LLC*.
- U.S. Securities and Exchange Commission.** 2019a. “Commission statement on market structure innovation for thinly traded securities, Release No. 34-87327.” Retrieved February 11, 2022 from <https://www.sec.gov/rules/policy/2019/34-87327.pdf>.
- U.S. Securities and Exchange Commission.** 2019b. “Division of trading and markets: Background paper on the market structure for thinly traded securities.” Retrieved February 11, 2022 from <https://www.sec.gov/rules/policy/2019/thinly-traded-securities-tm-background-paper.pdf>.
- Vandenberghe, L.** 2010. “The CVXOPT linear and quadratic cone program solvers.” Available at <http://www.seas.ucla.edu/~vandenbe/publications/coneprog.pdf>.
- Vayanos, Dimitri.** 1999. “Strategic trading and welfare in a dynamic market.” *Review of Economic Studies*, 66(2): 219–254.
- Vohra, Rakesh V.** 2011. *Mechanism design: A linear programming approach*. Cambridge University Press.
- Wittwer, Milena.** 2021. “Connecting disconnected financial markets?” *American Economic Journal: Microeconomics*, 13(1): 252–282.
- Yao, Chen, and Mao Ye.** 2018. “Why trading speed matters: A tale of queue rationing under price controls.” *Review of Financial Studies*, 31(6): 2157–2183.

# Online Appendix

## A Implementation and Policy Issues

This appendix discusses several practical implementation and policy issues related to the flow trading market design.

**Batch Interval** What is the optimal batch interval? The best choice likely depends on the asset class. We discuss three considerations: computation limits, factors that favor a shorter interval subject to computation constraints, and an open question about whether a longer interval is desirable for thinly traded assets.

The batch interval must be long enough to compute prices and trades. Our simulations suggest that a batch interval on the order of one second may be sufficient for many asset classes. That said, the computational simulations serve as a proof-of-concept rather than as a final word. There are many reasons why a real-world implementation could be meaningfully faster than our implementation. There is also the possibility that real-world markets may take longer to compute for reasons not anticipated by our simulation environment.

Next, three factors favor a batch interval as short as computationally feasible. First, a fast batch interval makes trading smoother—that is, smaller quantities are traded per batch. Smoother trading can be helpful to traders with complex dynamic trading strategies, who may wish to adjust their orders over time as information evolves. At the same time, traders with simpler strategies can leave their orders be, without much adjustment over time, whether the batch interval is long or short. Second, if the assets in question are traded in fragmented markets, and some of those markets are continuous, then the interaction of a discrete-time market with a continuous-time market is likely simplest if the discrete-time interval is short (Budish, Lee, and Shim (2021)). Third, information policy is more robust with a shorter batch interval, as there will be less pressure for within-batch information dissemination.

Last, we acknowledge the open question of whether a longer batch interval is desirable for more thinly traded assets. This is a common intuition among regulators and practitioners (see, e.g., U.S. Securities and Exchange Commission (2019*a,b*), Schwartz

(2001), and references therein). Du and Zhu (2017) provide some theoretical grounding for this intuition. A hard conceptual question is how to think about the batch interval for markets consisting of heavily traded and thinly traded assets. For instance, the U.S. equities market consists of about 7000 assets, some of which trade many times per second while others trade only a few times per hour. Similarly, in many sovereign debt markets, on-the-run assets are heavily traded while off-the-run assets are thinly traded.

**Information Policy** Information policy is typically discussed in terms of pre-trade and post-trade transparency. Concerning post-trade transparency, we propose that the exchange publish the trading volume and market-clearing price of each asset promptly after the quantities and price have been calculated. In addition, the exchange may also publish information about the aggregate net demand curve for each asset, holding the prices of all other assets fixed. This policy is analogous to publishing the outstanding limit order book in continuous markets. Then traders can make inferences about the price impact costs of their orders. The exchange would not publish information about the identity of traders, nor would it publish individual orders, since portfolio weights may reveal trading strategies.

For pre-trade transparency, we envision that the post-trade information from the auction at time  $t$  is the complete pre-trade information for the auction at time  $t + 1$ . As discussed by Budish, Cramton, and Shim (2015), this is the appropriate discrete-time analog of information policy in the continuous market. In both cases, the exchange (i) receives an order, (ii) economically processes the order, and then (iii) disseminates information about what happened (e.g., a trade or an order book update). The difference with discrete time is that the economic processing in (ii) occurs in discrete time, and hence the information dissemination in (iii) occurs in discrete time as well.<sup>31</sup>

The reason not to disseminate additional information between batch auctions, e.g., about the arrival of new orders or the cancelations of outstanding orders, is that such information could lead to gaming. For example, suppose the batch interval is one sec-

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<sup>31</sup>As pointed out by Budish, Cramton, and Shim (2015), in the continuous-time market it may look like traders can see information about the state of an asset's order book "right now," but that is an illusion—a trader's information is always as of a latency ago because it takes non-zero time for the exchange's matching engine to economically process new messages in step (ii) and to disseminate updates in step (iii). Discrete time makes more transparent that a trader's information as of time  $t$  is the state of the order book as of time  $t - \Delta$ , whether  $\Delta$  is the latency of information travel in a continuous market or the duration of the batch interval in a discrete market. Discrete time also eliminates the arms race for speed to reduce  $\Delta$ .

ond. A trader could submit a new order to buy a large quantity 100 milliseconds into the batch interval with the intention to cancel that order and instead send a new order to sell 999 milliseconds into the batch interval. In this scenario, the order to buy was never economically binding nor economically processed by the exchange, so sending this purposefully misleading message was costless.

We acknowledge that the pressure to disseminate information between auctions grows with the batch interval. This is one reason why a batch interval that is as short as computationally feasible may be appropriate for many asset classes. Additionally, one could extend flow trading to include order types that are economically binding for the duration of the current auction (i.e., cannot be canceled until after the next auction), with within-auction information disseminated about updates to this binding subset of the order book. Professional market-making firms might deploy such orders to attract trading volume, but we view this discussion as speculative and in need of future research.

With direct trade of arbitrary portfolios, information about the depth of the order book is inherently complex—there are infinitely many possible portfolios. The exchange might publish limited depth information about a fixed list of reference portfolios, alongside the depth information for individual assets.

**Trust and Transparency** Flow trading has the desirable property that all orders that are executable at published market-clearing prices do in fact execute. This property allows investors to confirm that their orders received correct execution from published prices.

By contrast, potentially executable orders in current markets do not consistently execute when other orders execute at the same price at nearly the same time. Uncertain execution erodes trust and market confidence, particularly among traders without state-of-the-art speed technology, whose orders are more apt to get poorer execution.

This difference between flow trading and the current market design arises from combining discrete time and continuous prices and quantities. Continuous prices and quantities make it possible to execute all executable orders at a market-clearing price without any need for rationing. Discrete time makes it possible to process multiple executable orders simultaneously in a batch process.

**Fairness** In traditional markets, the concept of “bid-ask spread” captures many of the features participants complain about as unfair. When there is a minimum tick size and

the bid-ask spread is one-tick wide, buyers and sellers cannot offer price improvement by quoting better prices between the best bid price and best offer price. Instead, buyers and sellers queue up at the best bid and offer, where the fastest traders have the highest priority in the queue. Slower traders perceive this as unfair. In dealer markets, dealers do not allow customers to post limit orders to trade directly with other customers. Instead, customers must trade with dealers in transactions where the dealer buys at the bid price and sells at the offer price. Customers perceive that dealer markets are unfair because dealers have privileges that customers do not have.

With flow trading, the concept of bid-ask spread is irrelevant when trade occurs because the market demand curve for each asset is continuous and strictly downward sloping. All trades clear at the same price. All executable orders execute. There are of course still trading costs. Trading a larger quantity, or trading a given quantity faster, requires offering a better price—that is, walking up the market's supply curve if buying or down the market's demand curve if selling—which creates price impact. The essential difference is that a trader can trade an epsilon quantity at the market-clearing price without any bid-ask spread. A practical interpretation of this point is that institutional investors will have to manage their price impact, but small retail investors can trade small quantities at the market-clearing price with negligible trading costs.

**Regulatory Objectives** The U.S. Securities and Exchange Commission, which regulates U.S. securities markets, pursues various policy objectives, including economic efficiency, competition, maintaining trust and confidence, and investor protection.

Flow trading is consistent with these objectives. It improves economic efficiency by reducing wasteful expenditure on fast data feeds, communication technologies, and trading algorithms. It does this by decreasing the arms race among traders to pick off orders and reducing the messages needed to implement dynamic trading strategies. It increases competition by enabling institutional investors to trade arbitrary long-short portfolios without the need for sophisticated trading platforms. Flow trading is also consistent with the current demand of small investors to trade fractions of shares and construct diversified portfolios consisting of tiny positions in many stocks. It promotes trust and confidence in markets by trading all executable orders at the same transparent price. It protects investors from poor order execution by making quality of order execution easy for customers to measure.

## B Further Simulation Details

In the base case, orders for index portfolios are randomly assigned to the six categories with corresponding probabilities in parentheses: the value-weighted market index (75%), the equal-weighted market index (5%), five value-weighted size indices (7.5%), five equally-weighted size indices (2.5%), ten value-weighted industry indices (7.5%), and ten equal-weighted industry indices (2.5%). The numbers here are chosen somewhat arbitrarily. We later vary the probabilities to study how they may affect computation times.<sup>32</sup> Finally, each order for individual assets and indexes has an equal probability of being buy or sell.

For each asset, we draw a random number from a lognormal distribution with mean of 1 and log-standard deviation of 1.7. Dividing these numbers by the sum of all realizations across 500 assets, we generate the probability that a given order is allocated to that asset. Then for each order for individual assets, we pick an asset from a multinomial distribution with the chosen probabilities. The probability multiplied by the total number of orders for assets (50,000) is the expected number of orders for that asset.

Following the market microstructure invariance hypothesis of Kyle and Obizhaeva (2016), the mean order size is set proportionally to the square root of the expected number of orders for that asset. The proportionality constant is chosen to make the aggregate expected order volume from individual stocks equal to the arbitrary scaling constant of \$10 million per batch using arbitrary expected ex-ante prices of \$100 per share. Then the standard deviation of the order size equals  $\sqrt{\exp(1.5^2) - 1}$  multiplied by the mean, approximately two times the mean.

For index portfolios, the expected number of orders for each size index is the same, and the expected number of orders for each industry index is the same. The size of the index orders is determined by multiplying the square root of the expected number of orders by the same proportionality factor used for individual orders. Since orders for the value-weighted market index are much larger and more numerous than orders for

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<sup>32</sup>To allow conveniently varying these probabilities, we generate them from five parameters: the probability that an index order is for either the equal-weighted or the value-weighted market index; the probability that a non-market index order is for a size index portfolio; the probability that a market index order is for the equal-weighted market index portfolio; and the probability that a size (industry) index order is for an equal-weighted size (industry) index portfolio. The five parameters and the restriction that the probabilities sum to one determine all six probabilities. We let each of the five parameters vary from 5% to 95%.

individual stocks, the overall value of the market index is primarily determined by these index orders. For pairs trades, each individual asset leg is generated randomly in the same manner as orders for the asset or portfolio. The dollar size of the larger leg is then truncated to match the dollar size of the smaller leg, again using expected ex-ante prices.

## C Details for Solving the KKT Conditions

Here we provide more details about the interior point method used to calculate market-clearing prices and discussed in Section 5.1.1.

The system of equations representing the modified KKT conditions in equations (19), (20), (21), and (23) can be rearranged and written<sup>33</sup>

$$\mathbf{p}^H - \mathbf{D}\mathbf{x} - \mathbf{W}^\top \boldsymbol{\pi} + \boldsymbol{\mu} - \boldsymbol{\lambda} = \mathbf{0}, \quad (37)$$

$$\mathbf{W}\mathbf{x} = \mathbf{0}, \quad (38)$$

$$\boldsymbol{\mu} \cdot \mathbf{x} = \bar{\nu} \mathbf{1}, \quad \boldsymbol{\lambda} \cdot (\mathbf{q} - \mathbf{x}) = \bar{\nu} \mathbf{1}, \quad (39)$$

$$\boldsymbol{\mu} > \mathbf{0}, \quad \boldsymbol{\lambda} > \mathbf{0}, \quad \mathbf{0} < \mathbf{x} < \mathbf{q}, \quad \boldsymbol{\pi} \in \mathbb{R}^N. \quad (40)$$

Equation (40) now has strict inequalities because  $\bar{\nu}$  is strictly positive in equation (39). This forces the multipliers to be strictly positive and  $\mathbf{x}$  to be an interior point.

In this system, the order book is represented by the matrix of portfolio weights  $\mathbf{W}$ , the vector of maximum rates  $\mathbf{q}$ , the vector of upper limit prices  $\mathbf{p}^H$ , and the diagonal matrix  $\mathbf{D}$ .<sup>34</sup> The goal is to find values for the trade rates  $\mathbf{x}$ , prices for assets (multipliers for market-clearing constraints)  $\boldsymbol{\pi}$ , and multipliers for trade rate constraints  $\boldsymbol{\mu}$  and  $\boldsymbol{\lambda}$

<sup>33</sup>The actual algorithm used in the simulations replaces  $\mathbf{q} - \mathbf{x}$  and  $\mathbf{x}$  in the complementary slackness conditions with slack variable  $\mathbf{s}_\mu$  and  $\mathbf{s}_\lambda$ , writes the approximation to the complementary slackness condition as  $\boldsymbol{\mu} \cdot \mathbf{s}_\mu = \boldsymbol{\lambda} \cdot \mathbf{s}_\lambda = \bar{\nu} \mathbf{1}$ , then solves for the slack variable along with the other variables. The slack variables quickly converge to their correct values  $\mathbf{s}_\mu := \mathbf{x}$  and  $\mathbf{s}_\lambda := \mathbf{q} - \mathbf{x}$  and will always attain their correct values if initialized correctly. This approach is essentially equivalent to the slightly simplified exposition given here.

<sup>34</sup>An order book is defined by a matrix of portfolio weights  $\mathbf{W}$ , a vector of maximum rates  $\mathbf{q}$ , a vector of upper limit prices  $\mathbf{p}^H$ , and a vector of lower limit prices  $\mathbf{p}^L$ . The algorithm uses the four quantities  $\mathbf{W}$ ,  $\mathbf{q}$ ,  $\mathbf{p}^H$ , and  $\mathbf{D}$ , where  $\mathbf{D}$  is a diagonal matrix with diagonal  $(\mathbf{p}^H - \mathbf{p}^L)/\mathbf{q}$ . When constructing  $\mathbf{D}$ , the subtraction  $\mathbf{p}^H - \mathbf{p}^L$  introduces numerical error because the percentage difference between  $\mathbf{p}^H$  and  $\mathbf{p}^L$  is typically very small. To avoid this numerical error, we drop  $\mathbf{p}^L$  and replace it with  $\mathbf{d}^{HL} := \mathbf{p}^H - \mathbf{p}^L$ , then define the diagonal of  $\mathbf{D}$  as  $\mathbf{d}^{HL}/\mathbf{q}$ . While  $\mathbf{p}^L$  is implicitly defined by  $\mathbf{p}^L := \mathbf{p}^H - \mathbf{d}^{HL}$ , the vector  $\mathbf{p}^L$  is not actually used in the algorithm.

which solve this system for a very small positive value of the interior point parameter  $\bar{v}$ , which is given by

$$\bar{v} := \frac{1}{2m} (\boldsymbol{\lambda}^\top (\mathbf{q} - \mathbf{x}) + \boldsymbol{\mu}^\top \mathbf{x}). \quad (41)$$

The algorithm starts with a large initial guess for  $\bar{v}$  and initial guesses for  $\mathbf{x}$ ,  $\boldsymbol{\pi}$ ,  $\boldsymbol{\mu}$ , and  $\boldsymbol{\lambda}$ , then calculates revised guesses iteratively, preserving equation (40). On a given iteration, the problem is linearized by substituting  $\mathbf{x} + \Delta\mathbf{x}$ ,  $\boldsymbol{\pi} + \Delta\boldsymbol{\pi}$ ,  $\boldsymbol{\mu} + \Delta\boldsymbol{\mu}$ , and  $\boldsymbol{\lambda} + \Delta\boldsymbol{\lambda}$  for  $\mathbf{x}$ ,  $\boldsymbol{\pi}$ ,  $\boldsymbol{\mu}$ , and  $\boldsymbol{\lambda}$ , respectively into this system of equations. This results in a system of equations which is linear in  $\Delta\mathbf{x}$ ,  $\Delta\boldsymbol{\pi}$ ,  $\Delta\boldsymbol{\mu}$ , and  $\Delta\boldsymbol{\lambda}$ , except for the non-linear terms  $\Delta\boldsymbol{\mu} \cdot \Delta\mathbf{x}$  and  $\Delta\boldsymbol{\lambda} \cdot \Delta\mathbf{x}$ . Since these quadratic terms are unknown, they are replaced with guesses  $\boldsymbol{\epsilon}_{\Delta\boldsymbol{\mu} \cdot \Delta\mathbf{x}}$  and  $\boldsymbol{\epsilon}_{\Delta\boldsymbol{\lambda} \cdot \Delta\mathbf{x}}$ , whose values are discussed in the paragraph after equation (53). Since the goal is to solve the system for smaller and smaller versions of  $\bar{v}$ , the value  $\bar{v}$  is replaced by a smaller quantity  $\epsilon_{\bar{v}}$ . The theory of interior point methods is based on reducing  $\bar{v}$  gradually iteration by iteration. In practice, the algorithm converges faster if large reductions are attempted. Here we set  $\epsilon_{\bar{v}} = 0$  to try to reduce  $\bar{v}$  substantially on each iteration.

Placing terms linear in  $\Delta\mathbf{x}$ ,  $\Delta\boldsymbol{\pi}$ ,  $\Delta\boldsymbol{\mu}$ , and  $\Delta\boldsymbol{\lambda}$  on the left side of equations, the linearized system can be written

$$-\mathbf{D} \Delta\mathbf{x} - \mathbf{W}^\top \Delta\boldsymbol{\pi} + \Delta\boldsymbol{\mu} - \Delta\boldsymbol{\lambda} = -\mathbf{r}_x, \quad \text{where} \quad \mathbf{r}_x := \mathbf{p}^H - \mathbf{D} \mathbf{x} - \mathbf{W}^\top \boldsymbol{\pi} + \boldsymbol{\mu} - \boldsymbol{\lambda}, \quad (42)$$

$$\mathbf{W} \Delta\mathbf{x} = -\mathbf{r}_\pi, \quad \text{where} \quad \mathbf{r}_\pi := \mathbf{W} \mathbf{x}, \quad (43)$$

$$\mathbf{x} \cdot \Delta\boldsymbol{\mu} + \boldsymbol{\mu} \cdot \Delta\mathbf{x} = -\mathbf{r}_\mu, \quad \text{where} \quad \mathbf{r}_\mu := \boldsymbol{\mu} \cdot \mathbf{x} + \boldsymbol{\epsilon}_{\Delta\boldsymbol{\mu} \cdot \Delta\mathbf{x}} - \epsilon_{\bar{v}} \mathbf{1}, \quad (44)$$

$$(\mathbf{q} - \mathbf{x}) \cdot \Delta\boldsymbol{\lambda} - \boldsymbol{\lambda} \cdot \Delta\mathbf{x} = -\mathbf{r}_\lambda, \quad \text{where} \quad \mathbf{r}_\lambda := \boldsymbol{\lambda} \cdot (\mathbf{q} - \mathbf{x}) + \boldsymbol{\epsilon}_{\Delta\boldsymbol{\lambda} \cdot \Delta\mathbf{x}} - \epsilon_{\bar{v}} \mathbf{1}. \quad (45)$$

Now define some notation. For any vector  $\mathbf{z}$ , let  $\mathbf{z}^{-1}$  denote the vector of element-by-element reciprocals of elements of  $\mathbf{z}$ . For any matrix  $\mathbf{Z}$ , let  $\text{diagvec}(\mathbf{Z})$  denote the vector on its diagonal. For any vector  $\mathbf{z}$ , let  $\text{diagmat}(\mathbf{z})$  denote the diagonal matrix with  $\mathbf{z}$  on its diagonal. Note that for a diagonal matrix  $\mathbf{Z}$ , we can write the matrix-vector product as an element-by-element product: if  $\mathbf{z} := \text{diagvec}(\mathbf{Z})$ , then  $\mathbf{Z} \mathbf{v} = \mathbf{z} \cdot \mathbf{v}$ .

Solve equations (44) and (45) for  $\Delta\boldsymbol{\mu}$  and  $\Delta\boldsymbol{\lambda}$ :

$$\Delta\boldsymbol{\mu} = \mathbf{x}^{-1} \cdot (-\mathbf{r}_\mu - \boldsymbol{\mu} \cdot \Delta\mathbf{x}), \quad (46)$$

$$\Delta \boldsymbol{\lambda} = (\mathbf{q} - \mathbf{x})^{-1} \cdot (-\mathbf{r}_\lambda + \boldsymbol{\lambda} \cdot \Delta \mathbf{x}). \quad (47)$$

Plug these solutions for  $\Delta \boldsymbol{\mu}$  and  $\Delta \boldsymbol{\lambda}$  into equation (42):

$$-\mathbf{D} \Delta \mathbf{x} - \mathbf{W}^\top \Delta \boldsymbol{\pi} + \mathbf{x}^{-1} \cdot (-\mathbf{r}_\mu - \boldsymbol{\mu} \cdot \Delta \mathbf{x}) - (\mathbf{q} - \mathbf{x})^{-1} \cdot (-\mathbf{r}_\lambda + \boldsymbol{\lambda} \cdot \Delta \mathbf{x}) = -\mathbf{r}_x. \quad (48)$$

Define

$$\mathbf{d} = \text{diagvec}(\mathbf{D}), \quad \boldsymbol{\eta} := (\mathbf{d} + \mathbf{x}^{-1} \cdot \boldsymbol{\mu} + (\mathbf{q} - \mathbf{x})^{-1} \cdot \boldsymbol{\lambda})^{-1}, \quad \boldsymbol{\Omega} = \text{diagmat}(\boldsymbol{\eta}). \quad (49)$$

Solve equation (48) for  $\Delta \mathbf{x}$  to obtain

$$\Delta \mathbf{x} = \boldsymbol{\eta} \cdot (\mathbf{r} - \mathbf{W}^\top \Delta \boldsymbol{\pi}), \quad \text{where } \mathbf{r} := \mathbf{r}_x - \mathbf{x}^{-1} \cdot \mathbf{r}_\mu + (\mathbf{q} - \mathbf{x})^{-1} \cdot \mathbf{r}_\lambda. \quad (50)$$

Define the “liquidity matrix”  $\mathbf{L}$  as

$$\mathbf{L} = \mathbf{W} \boldsymbol{\Omega} \mathbf{W}^\top. \quad (51)$$

While the liquidity matrix  $\mathbf{L}$  is theoretically positive definite (due to the exchange trading every asset), it may be numerically singular (since the exchange trading parameter is tiny). To regularize this matrix, add a vector of small positive values, denoted  $\boldsymbol{\epsilon}_L$ , to the diagonal. Substitute this solution for  $\Delta \mathbf{x}$  into the market-clearing condition in equation (43) ( $\mathbf{W} \Delta \mathbf{x} = -\mathbf{r}_\pi$ ) to obtain

$$(\mathbf{L} + \text{diagmat}(\boldsymbol{\epsilon}_L)) \Delta \boldsymbol{\pi} = \mathbf{r}_\pi + \mathbf{W}(\boldsymbol{\eta} \cdot \mathbf{r}). \quad (52)$$

Choosing  $\boldsymbol{\epsilon}_L$  such that the regularized liquidity matrix  $\mathbf{L} + \text{diagmat}(\boldsymbol{\epsilon}_L)$  is positive definite and not numerically singular, the above equation can be solved for  $\Delta \boldsymbol{\pi}$  using a Cholesky decomposition. Solutions for  $\Delta \mathbf{x}$ ,  $\Delta \boldsymbol{\mu}$ , and  $\Delta \boldsymbol{\lambda}$  can be obtained from the previous equations.

These solutions, however, may be such that the updated vectors  $\mathbf{x} + \Delta \mathbf{x}$ ,  $\boldsymbol{\pi} + \Delta \boldsymbol{\pi}$ ,  $\boldsymbol{\mu} + \Delta \boldsymbol{\mu}$ ,  $\boldsymbol{\lambda} + \Delta \boldsymbol{\lambda}$  do not satisfy equation (40) requiring that  $\mathbf{x} + \Delta \mathbf{x}$  be an interior point and multipliers  $\boldsymbol{\pi} + \Delta \boldsymbol{\pi}$ ,  $\boldsymbol{\mu} + \Delta \boldsymbol{\mu}$ ,  $\boldsymbol{\lambda} + \Delta \boldsymbol{\lambda}$  be strictly positive. To insure that the constraints hold, truncate the solutions by a factor  $\bar{\alpha}$  defined by

$$\bar{\alpha} := 0.99 \sup[\alpha : 0 \leq \alpha \leq 1, \mathbf{0} < \mathbf{x} + \alpha \Delta \mathbf{x} < \mathbf{q}, \boldsymbol{\mu} + \alpha \Delta \boldsymbol{\mu} > \mathbf{0}, \boldsymbol{\lambda} + \alpha \Delta \boldsymbol{\lambda} > \mathbf{0}], \quad (53)$$

The factor 0.99 insures that the updated solutions  $\mathbf{x} + \bar{\alpha}\Delta\mathbf{x}$ ,  $\boldsymbol{\pi} + \bar{\alpha}\Delta\boldsymbol{\pi}$ ,  $\boldsymbol{\mu} + \bar{\alpha}\Delta\boldsymbol{\mu}$ , and  $\boldsymbol{\lambda} + \bar{\alpha}\Delta\boldsymbol{\lambda}$  satisfy inequality constraints as strict inequalities.

Now consider how to choose the guesses  $\boldsymbol{\epsilon}_{\Delta\boldsymbol{\mu}\cdot\Delta\mathbf{x}}$  and  $\boldsymbol{\epsilon}_{\Delta\boldsymbol{\lambda}\cdot\Delta\mathbf{x}}$ . On each iteration, the solution for  $\Delta\mathbf{x}$ ,  $\Delta\boldsymbol{\pi}$ ,  $\Delta\boldsymbol{\mu}$ , and  $\Delta\boldsymbol{\lambda}$  is calculated twice reusing the same Cholesky decomposition. On the first try, the guesses are  $\boldsymbol{\epsilon}_{\Delta\boldsymbol{\mu}\cdot\Delta\mathbf{x}} = \boldsymbol{\epsilon}_{\Delta\boldsymbol{\lambda}\cdot\Delta\mathbf{x}} = \mathbf{0}$ . On the second try, the solution is polished using the results from the first try as guesses (Mehrotra (1992)):

$$\boldsymbol{\epsilon}_{\Delta\boldsymbol{\mu}\cdot\Delta\mathbf{x}} = \bar{\alpha}^2 \Delta\boldsymbol{\mu} \cdot \Delta\mathbf{x}, \quad \boldsymbol{\epsilon}_{\Delta\boldsymbol{\lambda}\cdot\Delta\mathbf{x}} = \bar{\alpha}^2 \Delta\boldsymbol{\lambda} \cdot \Delta\mathbf{x}. \quad (54)$$

The initial guess for  $\mathbf{x}$  is rather arbitrary, involving large values for the multipliers  $\boldsymbol{\mu}$  and  $\boldsymbol{\lambda}$ .

Computationally, calculation of the matrix  $\mathbf{L} = \mathbf{W} \boldsymbol{\Omega} \mathbf{W}^\top$  and its Cholesky decomposition are the most costly parts of the algorithm. The next most costly calculations are several matrix-vector products involving the sparse portfolio weight matrix  $\mathbf{W}$ . The remaining calculations are relatively less costly element-by-element vector products, scalar products, and inner products.

To make calculations involving  $\mathbf{W}$  more computationally efficient, the matrix  $\mathbf{W}$  is expressed as the product of two matrices,  $\mathbf{W} = \mathbf{R} \mathbf{B}$ . The first matrix  $\mathbf{R}$  is a vector of weights defining portfolios. It concatenates a sparse identity matrix (defining “weights” for individual assets) with a dense matrix whose columns define weights for index portfolios. The second matrix  $\mathbf{B}$  has one column for each order. For orders for individual assets or index portfolios, there is one non-zero weight for that asset or portfolio. For orders for pairs trades, there are two non-zero weights for the assets or portfolios that are involved. Since both of these matrices are sparse, there is computational savings from not forming the matrix  $\mathbf{W}$  explicitly. For example, the liquidity matrix  $\mathbf{L}$  is calculated efficiently as  $\mathbf{L} = \mathbf{R}(\mathbf{B} \boldsymbol{\Omega} \mathbf{B}^\top) \mathbf{R}^\top$ . We use a bespoke algorithm tailored to the specific sparse structure of these matrices.

## D Derivation of Equation (31) in Section 6.1

Recall, from equation (25), the expected utility from the optimal portfolio is

$$(\mathbf{m} - \boldsymbol{\pi})^\top \boldsymbol{\omega} - \frac{1}{2} \mathbf{A} \boldsymbol{\omega}^\top \boldsymbol{\Sigma} \boldsymbol{\omega}. \quad (55)$$

Equalizing the marginal benefit (the expected return) and the marginal cost (risk), the optimal portfolio in equation (29) is essentially the ratio of the expected return to risk.

Substituting the optimal portfolio in equation (29) into the first term above, we have

$$\begin{aligned}
(\mathbf{m} - \boldsymbol{\pi})^\top \boldsymbol{\omega} &= (\mathbf{m} - \boldsymbol{\pi})^\top \sum_{i=1}^K \mathbf{u}_i \left( \frac{\mathbf{u}_i^\top \mathbf{m} - \mathbf{u}_i^\top \boldsymbol{\pi}}{A \delta_i} \right) \\
&= \sum_{i=1}^K (\mathbf{m}^\top \mathbf{u}_i - \boldsymbol{\pi}^\top \mathbf{u}_i) \left( \frac{\mathbf{u}_i^\top \mathbf{m} - \mathbf{u}_i^\top \boldsymbol{\pi}}{A \delta_i} \right) \\
&= \sum_{i=1}^K \frac{(\mathbf{u}_i^\top \mathbf{m} - \mathbf{u}_i^\top \boldsymbol{\pi})^2}{A \delta_i} = \frac{1}{A} \sum_{i=1}^K \left( \frac{\mathbf{u}_i^\top \mathbf{m} - \mathbf{u}_i^\top \boldsymbol{\pi}}{\sqrt{\delta_i}} \right)^2.
\end{aligned} \tag{56}$$

Notice,  $\mathbf{u}_i^\top \mathbf{m} - \mathbf{u}_i^\top \boldsymbol{\pi}$  is a scalar and thus symmetric. Thus, the total expected return from the optimal portfolio is represented by the sum of squared Sharpe ratios of rotated portfolios, divided by risk aversion.

Now, we want to do the same thing to the second term in the expected utility:

$$\frac{1}{2} A \boldsymbol{\omega}^\top \boldsymbol{\Sigma} \boldsymbol{\omega} \tag{57}$$

Here, since  $\boldsymbol{\Sigma} = \mathbf{U} \boldsymbol{\Delta} \mathbf{U}^\top$ , and  $\boldsymbol{\Delta}$  is a diagonal matrix, we can express it as

$$\boldsymbol{\Sigma} = \mathbf{U} \boldsymbol{\Delta} \mathbf{U}^\top = \sum_{i=1}^K \delta_i \mathbf{u}_i \mathbf{u}_i^\top. \tag{58}$$

Also,  $\mathbf{U}$  is an orthonormal matrix, which implies that  $\mathbf{U} \mathbf{U}^\top = \mathbf{I}$ , an identity matrix. That is,  $\mathbf{u}_i^\top \mathbf{u}_i = 1, \forall i$  and  $\mathbf{u}_j^\top \mathbf{u}_i = 0, \forall j \neq i$ . Then substituting the optimal portfolio, we have

$$\begin{aligned}
\frac{1}{2}A\boldsymbol{\omega}^\top \boldsymbol{\Sigma}\boldsymbol{\omega} &= \frac{1}{2}A\boldsymbol{\omega}^\top \left( \sum_{i=1}^K \delta_i \mathbf{u}_i \mathbf{u}_i^\top \right) \left( \sum_{i=1}^K \mathbf{u}_i \left( \frac{\mathbf{u}_i^\top (\mathbf{m} - \boldsymbol{\pi})}{A\delta_i} \right) \right) \\
&= \frac{1}{2}A\boldsymbol{\omega}^\top \sum_{i=1}^K \delta_i \mathbf{u}_i \left( \frac{\mathbf{u}_i^\top (\mathbf{m} - \boldsymbol{\pi})}{A\delta_i} \right) \\
&= \frac{1}{2}\boldsymbol{\omega}^\top \sum_{i=1}^K \mathbf{u}_i (\mathbf{u}_i^\top (\mathbf{m} - \boldsymbol{\pi})) \tag{59} \\
&= \frac{1}{2} \left( \sum_{i=1}^K \left( \frac{\mathbf{u}_i^\top (\mathbf{m} - \boldsymbol{\pi})}{A\delta_i} \right) \mathbf{u}_i^\top \right) \left( \sum_{i=1}^K \mathbf{u}_i (\mathbf{u}_i^\top (\mathbf{m} - \boldsymbol{\pi})) \right) \\
&= \frac{1}{2A} \sum_{i=1}^K \left( \frac{\mathbf{u}_i^\top (\mathbf{m} - \boldsymbol{\pi})}{\sqrt{\delta_i}} \right)^2.
\end{aligned}$$

Thus, similar to the total expected return, the total risk from the optimal portfolio is represented as the sum of squared Sharpe ratios of rotated portfolios, except that it is divided by 2 times the risk aversion. Thus, the total risk is exactly half of the total expected return, where half comes from the fact that the risk is a quadratic function of the portfolio, while the return is linear.

Finally, combining equations (56) and (59) yields equation (31).