

Exhibit No: \_\_\_\_\_  
Application: A.25-09-014  
Witness: M. M. Dandridge  
Chapter: 16

**PREPARED REBUTTAL TESTIMONY OF M. MICHELLE DANDRIDGE  
ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY  
AND SAN DIEGO GAS & ELECTRIC COMPANY  
(LARGE ELECTRIC GENERATION/COGEN FORECAST)**

June 15, 2026

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1 **CHAPTER 16**

2 **PREPARED REBUTTAL TESTIMONY OF M. MICHELLE DANDRIDGE**  
3 **(LARGE ELECTRIC GENERATION/COGEN/FORECAST)**

4 **I. PURPOSE**

5 The purpose of this rebuttal testimony is to respond to the arguments, positions, and  
6 recommendations presented by the intervenors, including the Indicated Shippers (“IS”), and the  
7 Public Advocates Office At the California Public Utilities Commission (“Cal Advocates”),  
8 regarding the large electric generation/cogen forecast proposals of Southern California Gas  
9 Company (“SoCalGas”) and San Diego Gas & Electric Company (“SDG&E,” and collectively  
10 with SoCalGas, “Applicants”) in this 2027 Cost Allocation Proceeding (“CAP”).<sup>1</sup>

11 **II. CAL ADVOCATES’ PROPOSAL TO UPDATE PLEXOS MODEL WITH MORE**  
12 **RECENT REPORTS**

13 Cal Advocates proposes to update Applicants’ Chapter 4 Plexos model inputs using a  
14 more recent California Energy Commission report.<sup>2</sup> This proposal would be a burdensome  
15 effort with minimal benefit given such a burden. For each CAP filing, SoCalGas relies on the  
16 most current information available at the time the simulations are performed. In this regard, the  
17 energy market is inherently dynamic, with data and assumptions evolving continuously.  
18 Electricity demand is only one of many inputs in the analysis, and it is inappropriate to rerun an  
19 entire study based on selectively adjusting a single parameter.

20 **III. IS’ PROPOSAL TO CHANGE CARBON PRICE FORECAST**

21 IS proposes that Applicants use “a carbon price forecast grounded in current market data  
22 and consistent with actual Cap-and-Invest auction outcomes.”<sup>3</sup>

23 For each CAP filing, SoCalGas relies on the most current information available at the  
24 time the simulations are performed. The energy market is inherently dynamic, with data and  
25 assumptions evolving continuously. Carbon pricing is only one of many inputs in the analysis,

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<sup>1</sup> Given the volume of the various arguments, positions, and proposals raised by intervenors, Applicants have prioritized which issues to address in rebuttal testimony. Silence on any issue should not be construed as agreement with, or non-opposition to, that issue, as Applicants reserve the right to address additional issues not specifically mentioned in this rebuttal testimony at a later opportunity, such as evidentiary hearings and briefs.

<sup>2</sup> Direct Testimony of Samuel Topper on behalf of the Public Advocates Office (Ex. CA-04) at 55-57.

<sup>3</sup> Direct Testimony of Brian C. Collins on behalf of Indicated Shippers (Ex. IS-01) at 19-21.

1 and it is inappropriate to rerun an entire study based on selectively adjusting a single parameter.

2           SoCalGas also does not agree that higher carbon prices would substantially reduce gas-  
3 fired generation. Carbon costs represent just one element of overall operating expenses. In the  
4 model, hydroelectric, renewable, and nuclear generation are treated as must-take resources, while  
5 gas-fired generation serves as the marginal supply to balance and support these sources.  
6 Additionally, carbon pricing applies broadly to all thermal generation in California, including  
7 imported electricity produced from thermal resources, rather than being limited solely to  
8 SoCalGas's gas-fired assets.

9           This concludes my prepared rebuttal testimony.