



California Product Stewardship Council

P.O. Box 2321, Mill Valley CA 94942

May 12, 2008

CPUC, Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Ave., San Francisco, CA 94102

RE: Advice 3257-E (Pacific Gas and Electric Company ID U 39 E)

Subject: Modification of Existing Mass Market Program to Offer Limited Marketing Campaign of Fluorescent Lamp Recycling

The California Product Stewardship Council (CPSC) is an organization of regional and statewide local government associations and more than 80 jurisdictions from all corners of California. Our mission is to shift California's product waste management system from one focused on government funded and ratepayer financed waste diversion to one that relies on producer responsibility in order to reduce public costs and drive improvements in product design that promote environmental sustainability.

CPSC wholeheartedly supports PG&E's funding request for public education and the recycling of fluorescent lamps. We take specific objection to PG&E's request that proposes: "Local government partners will provide appropriate collection locations and staff to collect fluorescent lamps from residential customers and will arrange for lamp disposal." Local government cannot sustain collection locations and staff to collect fluorescent lamps from residential customers or arrange for lamp disposal.

Instead, we respectfully request that PG&E work with local government partners to disseminate public education about energy conservation and environmental protection and work with manufacturers, retailers and distributors to provide appropriate collection locations and staff and arrange for lamp recycling throughout the state of California. In Santa Clara County, certain retailers collect fluorescent lamps from residents.

The Santa Clara County, Del Norte Solid Waste Management Authority and San Luis Obispo County models utilize retail infrastructure to collect and recycle lamps from residents. Local government supports energy efficiency and recycling and will help with public education and assist the private sector in developing the necessary infrastructure to collect fluorescent lamps.

Utilities have great leverage with lamp manufacturers because they buy huge quantities of lamps. PG&E should promote industry participation in developing fluorescent lamp recycling.

Best regards,

Rob D'Arcy
Chair

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