

S.213 Advanced Metering Infrastructure & Cybersecurity

**Bryan Redmond, Director, Drinking Water & Groundwater Protection Division, VT DEC
House Energy and Digital Infrastructure, March 26, 2026**

Good Morning, For the record my name is Bryan Redmond, and I am the Director for the Drinking Water and Groundwater Protection Division at the Agency of Natural Resources. Thank you for the invitation to testify on S.213. I'd like to start with a bit of context regarding public water systems since this is not a committee I have appeared in front of before, offer a few brief comments specific to the bill, and try to answer any additional questions the committee may have.

A public drinking water system is defined as a source/combination of sources of water that serve 25 people or more for 60 days or more. There are 3 types of public drinking water systems and there are approximately 1,400 public water systems in Vermont.

- Most basic - TNC - 25 or more people for 60 days out of the year (691 systems)
- Next step - NTNC - 25 or more of the SAME people for at least 6 months (254 systems)
- Highest level of regulation - Community - 15 connections or 25 or more individuals in a residential setting.
 - There are currently 402 active public community drinking water systems in Vermont. These systems range from the water supply serving the City of Rutland, to a small manufactured housing community, to a homeowner's association and many of these utilities are run by volunteers.
 - This is the group to whom the bill will impact as they are the ones who most often rely on service meters.

A little more context involving metering at Vermont's public water systems and current requirements.

- There are different ways a water system can use meters.
 - Production – this is what the water system uses to measure the total amount of finished water the system produces.
 - Service – this measures what each individual service connection is using.
- The Water Supply Rule requires all water systems to have an acceptable means of metering the ***finished*** water.
- While the Agency supports service metering and technological advancements in this area, service line metering is encouraged not required.
 - We do not have specifications about installing, maintaining, or reading service meters.

- We do not have any specifications or requirements about rate setting or billing.
 - These issues are handled at the local level.
- Systems in Vermont run the full spectrum of billing and metering, ranging from a flat fee based on a building type to a fee as part of a lot rent or association dues, to fully metered connections billed based on metered usage.
- Because we are in Vermont, water service water meters need to be protected from freezing which means they are often located in basements or crawlspaces, connected to water service lines (that most public water systems do not own) that are deeply buried to avoid freezing in our long Vermont winters. For meters that cannot be read remotely this adds considerable time, expense, and complexity for the water supplier.
- In the water context, advanced metering technology provides the water system with the ability to read its service meters in an efficient manner. It is not operational technology and therefore considered low risk from a security perspective. The AMI does not affect the quality or quantity of the drinking water.
- In my 10+ years of being Director of the State's Drinking Water Program and responsible for regulation of Vermont's public water systems, I have yet to be contacted about an issue involving a public water system and a customer relating to advanced metering infrastructure. This leads me to believe any issue involving AMI is not currently widespread and is likely being effectively managed at the local level.

With respect to specific comments on S.213:

- The Agency's testimony in the Senate was largely focused on the cybersecurity provisions in Sec. 2 of S.213. While our concerns have been addressed in the current version of this bill, we also believe the language does not meaningfully change what already exists today. The water sector is represented and active in the Cybersecurity Advisory Council (CAC) and the council is diligently working to improve cybersecurity readiness and develop standards and protocols for the water sector. The work of the CAC and its on-going support for cybersecurity preparedness for the water sector is of critical importance. The CAC is scheduled to sunset on June 30, 2028. The Agency believes extension of the sunset date of the CAC would meet the underlying intent of the cybersecurity concerns expressed in S.213.
- The Agency's regulatory program does not currently have requirements for service line metering and perhaps more importantly we have virtually no involvement in the financial relationship between the water supplier and the customer. Currently, the AMI customer rights provisions are placed under the permit section of the public water supply statute. If this bill were to move forward, we would request the opportunity to remove this language from the permitting section of chapter 56 and into a stand-alone section.

- Finally, I have heard from some public works officials on this bill and would recommend the committee hear directly from them whose operations will be most directly affected by this bill.