



CHAMPLAIN WATER DISTRICT
Dedicated to Quality Water & Service



First In The Nation ~ Excellence In Water Treatment, Partnership For Safe Water

May 8, 2026

Representative Kathleen James
House Committee on Energy and Digital Infrastructure
115 State Street
Montpelier, VT 05633

RE: Additional Written Testimony on Bill S.213

Dear Representative James:

Thank you for the opportunity to testify before the House Committee on Energy and Digital Infrastructure on April 14th regarding Bill S.213 and to provide follow-up written testimony on April 17, 2026. I have read the most recent version of the bill, and I offer the following for consideration.

Documentation regarding water meters clearly indicates the following:

- **Advanced metering infrastructure does not pose a health risk.**
The Vermont Department of Health (VDH) has thoroughly documented this.
- **Advanced metering infrastructure does not pose a cybersecurity risk.**
Data transmitted by water meters include account number and current totalized volume; the data poses no personal or operational risk.
- **Advanced metering infrastructure improves water system operational efficiency.**
This infrastructure provides water systems with the capability to read meters efficiently allowing operators to focus time, money, and resources on other system needs. Improved meter reading efficiency helps keep rates stable for our water system users.

Under this bill the State would implement requirements that do not address any need or risk to Vermonters. There is also no significant outcry to address a lack of meter opt-outs. My understanding is this bill is the result of input to a legislator from one user in their district. That is not a valid reason to implement Statewide legislative action. This bill is an overreach.

There is no reason a water system user should not be required to have advanced metering infrastructure at their property as part of their water service. There are no risks to the property owner, and the equipment is a benefit to the water system and its users. In addition, it has the possibility of negatively impacting water systems and their users, particularly regarding system efficiency and rate stabilization. The State should not be passing legislature that is based on unfounded fears.

In Champlain Water District (CWD) owned distribution systems, we do allow for opt out of new installations in extremely limited situations, primarily users who cannot rationalize the documented lack of risks. Typically opt-outs are provided solely for the comfort of the user even though there is no risk associated with the meter. Our approach is to revisit the installation of advanced metering infrastructure in the future when conditions at the property change, which is primarily change in ownership. This is purely a customer relations decision since there is no valid reason to not install the infrastructure.

We do not offer removal once installed because it is now part of the property's infrastructure and there is no documented reason as to why removal is necessary. Allowing removal for an existing meter is a step backwards and further impacts the efficiency and time commitment for meter reading by operators. There should be **no allowance for removal** of existing advanced metering infrastructure.

To summarize, any allowance for opt-out is not required. There is no valid reason for the legislature to dictate a State-wide opt-out requirement. Water systems should be allowed to decide how to manage opt-outs depending on the configuration of their system and their relationship with their customers.

I appreciate the opportunity to be a resource for this Committee. Please do not hesitate to reach out to me with any questions or if you need additional information.

Sincerely,

CHAMPLAIN WATER DISTRICT

A handwritten signature in blue ink, consisting of a large, sweeping loop followed by a smaller, more intricate flourish.

Joseph Duncan, PE
General Manager