



CHAMPLAIN WATER DISTRICT
Dedicated to Quality Water & Service



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April 17, 2026

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

RE: Follow-up 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. As requested, I am following up with a summary of my testimony.

History of meters

- Meters have evolved to improve efficiency and reduce manpower to keep rates manageable.
- Future of water meters is radio read with old technology being phased out by meter manufacturers; once older reading technologies (i.e., touchpads) are no longer available manual reading will be required, which is very labor intensive.
- Radio read meters provide systems with capability to read meters efficiently allowing operators to focus time, money, and resources on other system needs.

Operational Technology (OT) vs Informational Technology (IT)

- OT controls physical processes typical via 2-way communication (major cyber risk – primarily treatment and distribution functions)
- IT manages data and business operations.
- Water meters reside in the IT world and outside of OT with no control capabilities.

Water meters do not pose risks to health and cybersecurity

- Radio-read water meters pose no significant health risk. Water meters emit at levels thousands of times lower than cell phones and well below FCC safety standards. Exposure is far below the allowable limits, often just a fraction of a percent.
- Vermont Department of Health (VDH) has conducted studies to document that water meters comply with the FCC exposure rules by a wide margin and pose no health risk.
- Water meters use encrypted signals that are only readable by proprietary vendor equipment.
- Data transmitted by water meters include account number and current totalized volume; the data poses no personal or operational risk.
- Water meters are not a cybersecurity risk.

Not aware of problems and concerns across State regarding water meters

- Majority of drinking water customers are served by municipally owned and operated systems; these local public entities establish regulations and policies based on public input.
- CWD does consider opt-out of new installations for customers, and this is very situational. After thoroughly informing the customer about the meter, an opt-out may be permitted. 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 a smart meter in the future when conditions at the property change.
- In talking with water systems around the State, I am not aware of widespread concerns with water meters. There are the occasional users who are concerned with water technology from a health or cybersecurity risk (as noted above these risks do not exist). This means there is not a problem and any problems or concerns from water customers are managed at the local level.
- Begs the question of what the need/driver for this bill is – does not indicate a need for regulation at the State level – KEEP control at local level.

Allowing removal is a major concern

- 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 an existing smart meter.
- There are no cyber risks with the meters nor are there documented health risks.
- CWD does not allow opt-out for removal of an existing smart meter. Removal is not necessary from a health and cybersecurity perspective and is counterproductive in advancing our meter reading efficiency, which helps to keep rates manageable.
- Putting the cost of removal/switch out on the water system is completely unacceptable.

Cybersecurity component of the bill not necessary

- There is a definite need to improve Vermont's cybersecurity posture.
- I am the Water/Wastewater representative on the Cybersecurity Advisory Council (CAC), which was established in 2023 and sunsets June 30, 2028. The CAC is required to develop a strategic plan for protecting the State's public sector and private sector information and systems from cybersecurity attacks, evaluate statewide cybersecurity readiness, and conduct an inventory and review of cybersecurity standards and protocols for critical sector infrastructures.
- The CAC takes a comprehensive approach across all critical infrastructure sectors, including water/wastewater. The CAC legislation already incorporates what is in this bill.
- The CAC has separate infrastructure sector groups, and I lead the Water/Wastewater group. Representatives from ANR have been intentionally included in the Water/Wastewater group such that their input can be incorporated and their needs addressed as part of the CAC's efforts. We currently have one representative from Drinking Water and one from Wastewater, both of which actively participate in this group.

This bill is not necessary

- Water meters pose no health or cybersecurity risks. Therefore, any allowance for opt-out is not required. Water systems may choose to offer opt-outs depending on the configuration of their system and their relationship with their customers.
- This bill creates regulations that take away local control for something that can be addressed at the local level. There is no indication of a problem in the State that requires legislation to supersede local control. It is unnecessary for the State to impose opt-out requirements and take away a water system's ability to develop policies that address the specific needs of their users and the system.
- The CAC is already set up to incorporate requests of the ANR and the cybersecurity language in this bill is not necessary. The Water/Wastewater sector group has intentionally included ANR representatives to achieve this.

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, appearing to read 'Joseph Duncan', with a stylized flourish at the end.

Joseph Duncan, PE
General Manager