Vermont Rural Water Association

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House Committee on Energy and Digital Infrastructure
S. 213 - An act relating to the use of advanced metering infrastructure devices
March 26, 2026
Testimony from Liz Royer, Executive Director

Hello, my name is Liz Royer and I am the Executive Director of the Vermont Rural Water Association. Vermont Rural Water is a non-profit organization that supports all public drinking water and wastewater systems through technical assistance, training, advocacy, and outreach. We represent over 320 system members that protect public health and allow for economic development in our towns and municipalities. These small, rural utilities provide safe drinking water and return clean, treated wastewater to rivers and lakes throughout the state. Since 2020, I have also served as the Chair of VT WARN – Vermont's mutual aid and emergency response network for water and wastewater systems. VT WARN has been active in recent years with flood events, contamination incidents, drought, and cybersecurity outreach.

Chair James, thank you for having me here today and allowing me to share our thoughts on metering and cybersecurity on behalf of all of the public drinking water systems in the state. We do not believe that water meters pose a risk to cybersecurity as this is not operational technology as it might be for other industries. In addition, we feel that the section on electric meters should be decoupled from S.213.

First, let me provide some background on the universe of the 403 public community drinking water systems in Vermont. A community water system has at least 15 connections or serves a residential population of at least 25 people. Less than one quarter of all community water systems in Vermont are owned by a town, village, or city. Over three-quarters are owned and governed outside of a traditional town municipal structure, such as fire districts, homeowner associations, and water co-ops. The majority of community water systems are managed by volunteer boards. Many of the small, rural systems are not metered

due to the expense of installation and maintenance.

In addition, only 3% of these 403 community drinking water systems are regulated by the Public Utilities Commission. The PUC regulates private companies such as ski resorts and water corporations. As provided in 30 V.S. A. § 203(3), the Public Utility Commission and the Department of Public Service have general jurisdiction over water utilities that are not owned by users, municipalities, or fire districts.

Regarding S. 213, we appreciate that our initial concerns regarding cybersecurity regulation have been addressed. We are supportive of the Vermont Cybersecurity Advisory Council providing nonbinding guidance to public drinking water systems on these issues.

However, in further research on advanced metering infrastructure or AMI, it has become apparent that these are not the same type of meters used by power companies. Advanced water meters are typically encrypted radio-read and contain very minimal data, often just two numbers - one being gallons that represents the water usage of the household and the other being the meter ID number. This poses basically no risk in terms of cybersecurity threats to both the customer and to the system with very little information being shared. There is no connection between the meter and the operation of water production or delivery of water to homes. There is no existing technology that allows water to be shut off remotely or through the meter.

In October 2024, Vermont Rural Water was selected as one of two states to host a pilot project focusing on cybersecurity at small, municipal drinking water systems. We were trained by EPA headquarters staff, CISA, Water ISAC, DC Water, and other leading agencies and organizations to provide on-site technical assistance for cybersecurity. This experience has expanded our knowledge and awareness of the many threats faced by our small water systems. We learned that the threat actors cast a wide net, and while Vermont systems wouldn't necessarily be specifically targeted, they look for any systems that have an easy path to infiltrate. Water meters have never been mentioned in any cybersecurity trainings or meetings as a vector since they are not connected to any operational technology or equipment.

So what is the solution? We suggest that best management practices for both meters and cybersecurity occur at the local level – either in the municipality or through the systems. We encourage operators to focus on the basics – personal cyber hygiene, developing protocols for former employees, password management, and ongoing training and awareness for small systems. Moving forward, the best option for building ongoing relationships and sharing resources is a townwide cybersecurity tabletop with involvement from the local Emergency Management Director (EMD), Select Board, Fire/Police, Water/Wastewater, and other local officials and legislators. We believe cybersecurity at Vermont water systems can be improved by partnering with the many organizations and agencies offering training and outreach, along with direct technical assistance from a trusted and knowledgeable provider.

We encourage you to invite water system managers and operators to testify on this bill. They have the direct experience with installation and maintenance of meters and have spoken with customers about their concerns. We believe you will learn that water AMI is not a threat to cybersecurity.

Thank you for allowing me to speak on behalf our state's drinking water systems. We appreciate this committee's efforts towards improving public health and protecting the environment as we all work together for Vermont's future.