

MINUTES

**TEHACHAPI-CUMMINGS COUNTY WATER DISTRICT  
REGULAR MEETING OF THE BOARD OF DIRECTORS  
March 15, 2023, 3:00 P.M.  
22901 Banducci Road, Tehachapi, CA 93561**

CALIFORNIA DPH RECOMMENDS ALL PERSONS CONTINUE WEARING MASKS INDOORS IN PUBLIC SETTINGS

- Item 1. Call to Order and Roll Call**  
**Directors Present:** Ables, Sasia, Schultz, Zanutto. Hall arrived at 3:01 p.m.  
**Legal Counsel:** None  
**Staff in Attendance:** Catherine Adams, Jon Curry, LaMinda Madenwald, Tom Neisler
- Item 2. Announcement**  
 President Schultz announced this meeting is being audio recorded, including all Board, Staff, and Public comments.
- Item 3. Flag Salute**  
 The Pledge of Allegiance was led by Director Sasia.
- Item 4. Approval of Agenda**  
 Director Hall moved to approve the agenda. Director Sasia seconded the motion, and it was carried on the following vote: Ayes: Ables, Hall, Sasia, Schultz, Zanutto; Noes: None; Abstain: None; Absent: None. Motion passed.
- Item 5. Comments by any Party on Items of Interest and Within the Subject Matter Jurisdiction of the Legislative Body**  
 Mr. Jon Hammond, Board Member of Tehachapi Resource Conservation District (TRCD), addressed the Board and explained the TRCD is a local non-regulatory Special District. They are sponsoring a Native Plant Sale which will fall on Earth Day this year, so they are having additional activities which will include planting trees at each of the five local school sites. He shared a summary of the background of how TRCD was developed and its relation to what is now the Tehachapi-Cummings County Water District. He provided details of the activities for the event and invited the District to have an information table that day and asked if the District would like to sponsor the event in some fashion, they would appreciate it.
- President Schultz thanked Mr. Hammond and asked Mr. Neisler for advice on what the District can do in this situation. Mr. Neisler stated he does not believe there is anything prohibiting the District from sponsoring this event. The District practice has been not to provide sponsorship to events, no matter how worthy they are, because once you say yes to someone, how do you say no to someone else, and the District funds include taxpayer dollars. There was a discussion on how the District can participate and the Board liked that it is an educational event that promotes conservation of resources. The Board delegated this topic to the General Manager and asked Mr. Hammond to work directly with him as it is within his purview. President Schultz commented he would like to see the District do something on water conservation and soil conservation if there is any information on that. Mr. Hammond thanked the Board.
- Item 6. Consent Calendar - Consent items are considered routine and are intended to be acted upon as a single item, without discussion. During this portion of the meeting, the Consent Calendar will be read aloud. Prior to approval, the President will give the Board the opportunity to remove any item from the Consent Calendar to be discussed and voted on individually. The President will also give staff and the public the opportunity to request any item be discussed individually, in which case the President will**

**determine whether the item will be removed from the Consent Calendar. The remaining calendar will be acted upon. Any removed items will then be heard and acted upon individually.**

- a. Approve Minutes of the Special Board Meetings of February 3, 2023, and February 10, 2023, and Regular Board Meeting of February 15, 2023
- b. Approve Financial Report and Payment of Bills

President Schultz asked if there were any items the Board, Staff or Public would like to remove for discussion, and he removed Item 6.b. Payment of Bills.

Director Zanutto moved to approve the Consent Calendar Item 6.a. President Schultz seconded the motion, and it was carried on the following vote: Ayes: Ables, Hall, Sasia, Schultz, Zanutto; Noes: None; Abstain: None; Absent: None. Motion passed.

President Schultz referred to the oil purchase asking what quantity of oil that was as it was a large purchase. Mr. Curry responded this was the oil for the District bulk oil storage tanks at each Pumping Plant and he believes it was around 1600 gallons total. The oil used at the plants is expensive oil. Mr. Neisler added that as this is the beginning of the pumping season, it is a large purchase and the item in the budget for this is \$100,000.

President Schultz moved to approve the Consent Calendar Item 6.b. Director Zanutto seconded the motion, and it was carried on the following vote: Ayes: Ables, Hall, Sasia, Schultz, Zanutto; Noes: None; Abstain: None; Absent: None. Motion passed.

#### **Item 7. General Manager's Report**

Mr. Neisler reported on the following:

- He stated the photo is of the street sign at Jacaranda Drive near Territory Way up near the top of Bear Valley showing quite a bit of snow. We have employees who live in this general area and have had to fight their way through this to get to work the past few weeks. This shows the extreme weather we have been dealing with. There are still more atmospheric rivers coming so we will see what the next month has in store for us.
- At the State level, departments are very busy. DWR is still trying to approve Groundwater Sustainability Plans (GSP) that were previously rejected. We are thankful the District is not subject to those requirements due to the fact that we have been managing groundwater for 50 years and we are exempt from SGMA regulations.
- DWR is still working through the comments they have received on the draft EIR for the Delta Conveyance Project (DCP). They have hired a consulting team to help with that.
- There was a Special Board Meeting last week at which the Cummings Basin Allocations were approved. He thanked Staff who worked diligently with customers on this process and the letters and allocation list have been mailed out to all the pumpers and is available on the website.
- The Kern County Water Summit is Friday March 24<sup>th</sup> at the Mechanic's Bank Arena in Bakersfield. There are still seats available if more Directors would like to attend.
- We began to publicize the Annual Pump Plant Tour on April 20<sup>th</sup> and he described the tour.
- President Schultz and he have attended a webinar series from CSDA entitled "Build the Board Chair & Manager Connection". He felt it was well presented, informative and helpful.
- He has not included the usual charts in this report as they are included in a presentation later on the agenda.
- He offered to answer any questions the Board or Public may have and there were none.

**Item 8. Operations Report**

Mr. Curry reported on the following:

- Staff has been coordinating with Mr. Key Budge at the City of Tehachapi on a Community Clean-Up Day on March 20<sup>th</sup> from 2:00 p.m. to 4:00 p.m. and a flyer is attached to the Staff Report. Caltrans is involved this year and the event will cover a larger area. He invited everyone out to come help.
- He has been working on a public portal for the District's GIS System with California CAD Solutions. This will allow for the public to access limited information like the Director divisions, facilities, and boundaries and be available through our website. Staff is working on reviewing the portal now.
- The Authority to Construct (ATC) permit from Eastern Kern Air Pollution Control District (EKAPCD) has been issued for the new 60kW emergency generator at Pump Plant 2. The delivery of the generator has been pushed back until late April so the installation will have to wait until after Pumping Season has concluded for 2023.
- Tehachapi Basin extraction wells are currently shut down. Brite Lake data from March 10<sup>th</sup> was: elevation 4,349.0', volume 832.9 AF, and level 23'. We started the importation system today and had two engines running at 14 CFS by 1:00 p.m.
- He reviewed the projects and maintenance tasks completed by the Pumping Systems and Pipeline Departments as detailed in the Staff Report and referenced the attached photos.
- Staff received notice from the State Water Resources Control Board – Division of Drinking Water (SWRCB-DDW) that the 2022 Electronic Annual Report (EAR) will be available beginning on March 13<sup>th</sup> and the deadline for submittal is May 13<sup>th</sup>. Staff anticipates completing the EAR ahead of the deadline.
- He offered to answer any questions the Board or Public may have.

Director Sasia asked if there were any plans to upgrade the panels at the Nunes Well project as they look dated. Mr. Curry stated they just purchased that well last year and they will incorporate upgrading those panels in the next CIP and do upgrades similar to what they have done with the Dennison Well.

**Item 9. Approve Requests for Temporary Assignment of Water Rights**

Ms. Adams stated the Tehachapi Basin Adjudication Judgment allows water rights holders to temporarily lease their water rights on an annual basis. The lease can only be for one calendar year at a time and there is a specific form and procedure that is in place as stated in Resolution TW-2011, Tehachapi Basin Watermaster Rules and Regulations. The forms must be submitted by March 1<sup>st</sup> each year. Attachment A is a listing of everyone transferring rights and the Allowed Pumping Allocation (APA) for each transfer. Attachment B contains copies of the signed and notarized transfer documents. She stated the County of Kern lease from Lehigh Cement West for the Tehachapi Landfill, was the only form that was not received by the deadline; it was received March 3<sup>rd</sup>. She asked that the Board grant an exception for this lease as the weather that week caused road closures and mail delays and the County maintained contact with her throughout their struggle, they were just unable to get the document from Lehigh in time to meet the deadline. President Schultz stated that in the past the Board has granted grace to people who had similar problems with meeting the deadline.

Director Sasia moved that the Board approve the 2023 Temporary Assignment of Water Rights for all parties listed in Table 3, Attachment A. President Schultz seconded the motion, and it was carried on the following vote: Ayes: Ables, Hall, Sasia, Schultz, Zanutto; Noes: None; Abstain: None; Absent: None. Motion passed.

**Item 10. Receive and File Update on 2023 Operations**

Mr. Neisler stated this item is for information purposes only. At last week's Special Board Meeting, Director Zanutto asked where we are at and where we are going. He answered the question at the time but as things are changing so rapidly, he felt it worth the time to prepare a detailed report for the Board and Public to discuss the current conditions and how they have impacted our plans for this year. The

Table A Allocation remains at 35% and we are hopeful this gets updated at the end of this month. As Mr. Curry reported, we started the system today. Today is March 15<sup>th</sup>; in order for us to import 10,000 AF of water, we would typically start pumping on February 1<sup>st</sup>, so we are 6 weeks behind.

He prepared a PowerPoint Presentation (attached to the Staff Report) and asked that anyone stop him with questions as he goes and shared the list of topics he will cover. He reviewed that as of December 8, 2022, Lake Oroville was at 28% capacity and 55% of historical average and San Luis Reservoir was at 26% capacity and 47% of historical average. As of last Friday, March 9<sup>th</sup>, Lake Oroville moved up to 75%/115% and San Luis 84%/101% respectively. On this same day, DWR started releasing water out of Oroville Spillway and are currently releasing 20,000 CFS over the spillway and it is holding up. He displayed and described the charts showing the Lake Oroville and San Luis Reservoir Storage Levels. As the San Luis levels continue to increase, it will lead to technical spilling, not physical spilling. He described the split of State Water Project water and Central Valley Project water contained in the San Luis Reservoir and its total capacity is 2 million acre feet. He described how they have to effectively manage flood control levels. He presented snowpack charts noting that the dramatically high snow levels are in the south of the state and are less effective in terms of our water supply.

He reviewed the stages of allocation updates to the Table A Allocation in 2022 beginning at 0%, moving up to 15% and then back down to 5%. For 2023, the initial allocation was 5%, it increased to 30% in January, and then increased to 35% in February. We are waiting for the March update and described how conservative the previous calculations have been. Since February 1<sup>st</sup>, California has received record precipitation so we are hopeful the allocation will increase accordingly. There are many factors impacting DWR's ability to increase the allocation. He shared a slide provided from an outside source and explained that the Biological Opinions by which the two projects operate. Under the State BiOps, 40%-60% of the water has to flow, unimpaired, out to the ocean. After the December storms, California received 12.1 million acre feet (AF) of inflow into the Delta. Of that, 1 million AF was consumed in the Delta, 2.6 million AF went to the projects combined, and 8.6 million AF of water went out into the ocean. In response to this, State Water Contractors (SWC), are very upset and argue the State is not providing them with the water they need to service customers. On February 22, the Governor issued an Executive Order (EO) and implemented a Temporary Urgency Change Petition (TUCP) with the State Water Resources Control Board that moved the point of measurement for the outflow required into the Delta by approximately 80 miles to the west providing that much more distance for things to settle out (turbidity to reduce, temperatures to stabilize), and allows more flow to go south into the two systems. Then the environmental groups were upset. The pumping capacity in the two systems, increased into their maximum flow, 9,250 CFS, being pumped into the SWP and into San Luis Reservoir. On March 9<sup>th</sup>, a coalition of environmental groups announced they were suing the State over the Governor's EO and TUCP. The Governor withdrew those two motions on that same day and Mr. Neisler explained some of the further political challenges the Governor faces in making decisions.

Locally, we have planned operations for this 35% allocation as we cannot plan on assumptions. Last week we revised our plan to begin pumping the last week of March, as we had originally planned for pumping to begin April 1<sup>st</sup>. The April 1<sup>st</sup> start date is because we do not have any natural gas purchased until then and we would run out of water at 35% before we want to cease operations. Last week the KCWA announced the San Luis Reservoir was scheduled to spill and that would make Article 21 water available. This water is sold at a low price on a pro-rata share. The District purchased this water in 2017 and there are many conditions that apply to take delivery of this water. One condition is we cannot take delivery of Article 21 water until we have taken delivery of all the Table A water we have available as well as any carryover in San Luis Reservoir (TCCWD has 104 AF) which is what we started pumping today. He explained how quickly the process moves for Article 21 water; submit a request on a Friday and start pumping the next Wednesday. To utilize the availability of this water, we have to enter into an agreement to store it down in the San Joaquin Valley since we cannot pump it before the Table A water.

He worked with our previous banking partner, Improvement District 4 (ID4), to set up another storage agreement and he has requested as much Article 21 water as we can get. Mr. Hammond asked if there were any restrictions on how that water can be used, such as for recharge only and Mr. Neisler explained there are not, and they went on to discuss Chanac Creek. Ms. Susan Wells, GHCSO, asked about the storage exchange and Mr. Neisler explained that we deposit 2 AF and ID4 keeps 1 AF, and we get 1 AF back. This works out because Article 21 water is very inexpensive, around \$40/AF.

Natural gas is a big factor in deciding when to start pumping. He purchased gas yesterday, at \$6.05/mmbtu, for the remainder of March and requested a quote for enough gas to run a third engine for April through September (\$5.17/mmbtu), and for two engines worth of gas for October (\$4.34/mmbtu) and purchased those supplies. The gas that he purchased in December of 2020 for use in 2023, was \$2.76/mmbtu so the blended cost of natural gas for this pumping season is \$3.77/mmbtu. He explained that since there is no storage for natural gas, there are penalties for not using what you order, and you need to stay within a 5% tolerance of what you ordered as everything comes directly off the line. Mr. Jay Schlosser, City of Tehachapi, inquired about the difference in cost for having to purchase additional natural gas and how that extra cost gets handled. Mr. Neisler explained the District has to absorb it; there is no provision in the current rate structure to have emergency rates in place.

With the current 35% Table A Allocation, we can meet all surface water delivery requests made in November 2022 and some water is available for mandatory banking and conjunctive use requests. This can be done without taking any water from the District's banked reserve account. If the allocation increases to 52% or beyond, the plan will be to operate the system until November and he will purchase more gas accordingly and try to import as much water as we can however, we will not get to 10,000 AF because we are 6 weeks behind. To help make up for that, we will operate with three engines starting April 1<sup>st</sup> and that is not the typical operation. There is a lot of manual tuning of the engines to maximize performance and emissions. If the recharges are still operating efficiently, we can stay running three engines through October, however we may need to cut back to two engines if the water isn't percolating because we cannot have the lake full through winter. It will depend how operations go, but he anticipates being able to pump more than 8,000 AF this season. With an allocation above 52%, we can meet all surface water and mandatory banking requests as well as some voluntary banking requests.

Mr. Neisler stated the District entered into a voluntary agreement years ago where the District pays a standby charge annually (about \$10,000), to access water from the Lower Kern River when there is excess. We anticipate having some of this water available this year as well and it is sold at a fixed cost of \$5.00/AF and would be stored down in the valley. The last time the District took delivery of Lower Kern River water was in 2017. He went on to describe the Brite Lake and recharge operations and displayed a chart comparing previous years. He described how Staff has to balance the lake levels considering water being pumped in, how much is going out to deliver to customers and recharges, and maintaining line pressure during months customers are irrigating. They hope to have the lake level around 700 AF at the end of the season.

In conclusion, we have seen unprecedented levels of precipitation across the state, with record breaking snowpack and dramatic changes to the Table A Allocation. There has been inconsistent State Water Project management that water contractors are trying to cope with which has led to more tension between environmental groups and water purveyors. This also has led to shifting messages to our customers and the public. While more water is great news, for some customers, this news comes too late in their planning process to take advantage of some of the water. All things considered, this increase in allocation is great news and we are in an incredibly good situation this year, which is beyond what we could have expected. We will do our best to take advantage of every drop of water we can.

Director Zanutto commented it was an excellent presentation and there has been a lot of thought put into the operation plan. He pointed out that taking advantage of Article 21 and Lower Kern River water in 2017 is what helped us get through this last drought. He asked if the increase in natural gas costs would come out of the District's Rate Stabilization Fund. Mr. Neisler responded we have a good balance in our water purchase account due to selling back natural gas that we could not use last year, at a higher price than we prepaid. So, there are some reserves to meet that deficit this year. President Schultz asked about peaking the lake in May, and asked if we have enough room in recharges to keep the lake full without having to turn off any engines if customers are not using enough water during that time (due to a wet year). Mr. Neisler stated we will not let the lake fill by taking water off the line in Cummings Basin where we now have additional recharge capacity and let water flow out of the lake to Tehachapi Basin to control the level.

**Item 11. Board of Directors Comments**

Directors Ables, Sasia and Zanutto thanked Mr. Neisler for the good report. President Schultz commented he has been watching the snowpack very closely and it is absolutely amazing. The snowpack in the north is not as good as it is in the south, but there is currently more water in the snowpack above Lake Oroville than there is in the lake at this moment. That is really wonderful to see.

**Item 12. Adjourn to Closed Session**

President to reference Closed Session items as presented on Agenda, then Board to adjourn to Closed Session.

- a. In Accordance with Exhibit A Attached hereto, TCCWD v. City of Tehachapi *Et al.*
- b. In Accordance with Exhibit B Attached hereto, DWR v. All Persons Interested in Authorization of WaterFix Revenue Bonds, et al.; DWR v. All Persons Interested In The Matter of the Authorization of Delta Program Revenue Bonds, *Et al.*
- c. In Accordance with Exhibit C Attached hereto, Rosedale-Rio Bravo WSD *Et al.* v. Kern County Water Agency *Et al.*
- d. In Accordance with Exhibit D Attached hereto, Potential Litigation – 1 case

The Board adjourned to Closed Session at 4:51 p.m.

**Item 13. Return to Open Session**

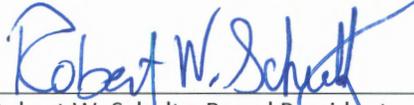
The Board returned to Open Session at 5:44 p.m.

**Report Action Taken in Closed Session:**

- a. No reportable action.
- b. No reportable action.
- c. No reportable action.
- d. No reportable action.

**Item 14. Adjournment**

The meeting was adjourned at 5:44 p.m. on a motion made by Director Hall, seconded by Director Sasia, and carried on the following vote: Ayes: Ables, Hall, Sasia, Schultz, Zanutto; Noes: None; Abstain: None; Absent: None. Motion passed.

  
Robert W. Schultz, Board President

  
Catherine Adams, Board Secretary



**CLOSED SESSION ITEM DESCRIPTIONS**

(Gov. Code § 54954.5)

A. CONFERENCE WITH REAL PROPERTY NEGOTIATOR (Gov. Code § 54956.8.)

Description of Property: \_\_\_\_\_  
Proposed District Negotiator: \_\_\_\_\_  
Negotiating Parties: \_\_\_\_\_  
Subject of Conference: \_\_\_\_\_

B. CONFERENCE WITH LEGAL COUNSEL (Gov. Code § 54956.9.)

1. Existing Litigation: KCSC No. BCV-21-102184 KCT  
Name of Case: TCCWD v. City of Tehachapi *Et al.*  
\_\_\_\_\_  
2. Anticipated Litigation: \_\_\_\_\_  
Gov. Code § 54956.9 (b): \_\_\_\_\_  
Gov. Code § 54956.9 (c): \_\_\_\_\_

C. PUBLIC EMPLOYEES (Gov. Code § 54957.)

1. Appointment: \_\_\_\_\_  
Title: \_\_\_\_\_  
2. Employment: \_\_\_\_\_  
Title: \_\_\_\_\_  
3. Performance Evaluation: \_\_\_\_\_  
Title: \_\_\_\_\_  
4. Discipline/Dismissal/Release: \_\_\_\_\_

D. CONFERENCE WITH LABOR NEGOTIATOR (Gov. Code § 54957.6.)

Agency Negotiator: \_\_\_\_\_  
Employee Organization: \_\_\_\_\_  
Unrepresented Employee: \_\_\_\_\_



**CLOSED SESSION ITEM DESCRIPTIONS**

(Gov. Code § 54954.5)

**A. CONFERENCE WITH REAL PROPERTY NEGOTIATOR (Gov. Code § 54956.8.)**

Description of Property: \_\_\_\_\_  
Proposed District Negotiator: \_\_\_\_\_  
Negotiating Parties: \_\_\_\_\_  
Subject of Conference: \_\_\_\_\_

**B. CONFERENCE WITH LEGAL COUNSEL (Gov. Code § 54956.9.)**

1. Existing Litigation: Two Cases  
Names of Cases: DWR v. All Persons Interested in Authorization of WaterFix Revenue Bonds, et al.; DWR v. All Persons Interested In The Matter of the Authorization of Delta Program Revenue Bonds, et al.
2. Anticipated Litigation: \_\_\_\_\_  
Gov. Code § 54956.9 (b): \_\_\_\_\_  
Gov. Code § 54956.9 (c): \_\_\_\_\_

**C. PUBLIC EMPLOYEES (Gov. Code § 54957.)**

1. Appointment: \_\_\_\_\_  
Title: \_\_\_\_\_
2. Employment: \_\_\_\_\_  
Title: \_\_\_\_\_
3. Performance Evaluation: \_\_\_\_\_  
Title: \_\_\_\_\_
4. Discipline/Dismissal/Release: \_\_\_\_\_

**D. CONFERENCE WITH LABOR NEGOTIATOR (Gov. Code § 54957.6.)**

Agency Negotiator: \_\_\_\_\_  
Employee Organization: Not Applicable  
Unrepresented Employee: \_\_\_\_\_



**CLOSED SESSION ITEM DESCRIPTIONS**

(Gov. Code § 54954.5)

A. CONFERENCE WITH REAL PROPERTY NEGOTIATOR (Gov. Code § 54956.8.)

Description of Property: \_\_\_\_\_  
Proposed District Negotiator: \_\_\_\_\_  
Negotiating Parties: \_\_\_\_\_  
Subject of Conference: \_\_\_\_\_

B. CONFERENCE WITH LEGAL COUNSEL (Gov. Code § 54956.9.)

1. Existing Litigation: KCSC No. BCV 21100418 TSC  
Name of Case: Rosedale-Rio Bravo WSD *Et al.* v. Kern County Water Agency  
*Et al.*

2. Anticipated Litigation: \_\_\_\_\_  
Gov. Code § 54956.9 (b): \_\_\_\_\_  
Gov. Code § 54956.9 (c): \_\_\_\_\_

C. PUBLIC EMPLOYEES (Gov. Code § 54957.)

- 1. Appointment: \_\_\_\_\_  
Title: \_\_\_\_\_
- 2. Employment: \_\_\_\_\_  
Title: \_\_\_\_\_
- 3. Performance Evaluation: \_\_\_\_\_  
Title: \_\_\_\_\_
- 4. Discipline/Dismissal/Release: \_\_\_\_\_

D. CONFERENCE WITH LABOR NEGOTIATOR (Gov. Code § 54957.6.)

Agency Negotiator: \_\_\_\_\_  
Employee Organization: \_\_\_\_\_  
Unrepresented Employee: \_\_\_\_\_



**CLOSED SESSION ITEM DESCRIPTIONS**

(Gov. Code § 54954.5)

**A. CONFERENCE WITH REAL PROPERTY NEGOTIATOR (Gov. Code § 54956.8.)**

Description of Property: \_\_\_\_\_  
Proposed District Negotiator: \_\_\_\_\_  
Negotiating Parties: \_\_\_\_\_  
Subject of Conference: \_\_\_\_\_

**B. CONFERENCE WITH LEGAL COUNSEL (Gov. Code § 54956.9.)**

1. Existing Litigation: \_\_\_\_\_  
Name of Case: \_\_\_\_\_  
\_\_\_\_\_
2. Anticipated Litigation: \_\_\_\_\_  
Gov. Code § 54956.9 (b): \_\_\_\_\_  
Gov. Code § 54956.9 (c): 1 potential case

**C. PUBLIC EMPLOYEES (Gov. Code § 54957.)**

1. Appointment: \_\_\_\_\_  
Title: \_\_\_\_\_
2. Employment: \_\_\_\_\_  
Title: \_\_\_\_\_
3. Performance Evaluation: \_\_\_\_\_  
Title: \_\_\_\_\_
4. Discipline/Dismissal/Release: \_\_\_\_\_

**D. CONFERENCE WITH LABOR NEGOTIATOR (Gov. Code § 54957.6.)**

Agency Negotiator: \_\_\_\_\_  
Employee Organization: \_\_\_\_\_  
Unrepresented Employee: \_\_\_\_\_