

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:

**NATIONAL ENERGY & GAS
TRANSMISSION, INC. (f/k/a PG&E
NATIONAL ENERGY GROUP, INC.), et
al.**

Debtors.

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* Case No.: 03-30459 (PM) and 03-30461 (PM)
through 03-30464 (PM) and 03-30686 (PM)
* through 03-30687 (PM)
Chapter 11

*

(Jointly Administered under
* Case No.: 03-30459 (PM))

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**NATIONAL ENERGY & GAS TRANSMISSION, INC.'S
MOTION FOR SUMMARY JUDGMENT ON (1) ITS MOTION TO ENFORCE
SUBROGATION RIGHTS AGAINST NEGT ENERGY TRADING POWER, L.P. ON
ACCOUNT OF GUARANTEE PAYMENT TO LIBERTY ELECTRIC POWER LLC;
AND (2) OBJECTIONS OF NEGT ENERGY TRADING POWER, L.P. THERETO**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, as made applicable to this contested matter by Rules 7056 and 9014 of the Federal Rules of Bankruptcy Procedure, National Energy and Gas Transmission, Inc. ("NEGT"), hereby submits this Motion for Summary Judgment on NEGT's Motion to Enforce Subrogation Rights Against NEGT Energy Trading Power, L.P. ("ET Power") filed on March 9, 2009 (Docket No. 4161); and (2) the Objections of ET Power to Motion of NEGT to Enforce Subrogation Rights Against ET Power on account of guaranty payment to Liberty Electric Power LLC, filed on April 20, 2009 (Docket No. 4184).

In support thereof, NEGT states that there is no genuine dispute as to any material fact regarding NEGT's entitlement to enforce subrogation rights against ET Power as a result of the \$140 million payment to Liberty Electric Power LLC on ET Power's obligation. For the reasons set forth in the corresponding memorandum in support of this motion, NEGT respectfully

requests that the Court enter an order granting summary judgment in favor of NEGТ. A proposed order is attached hereto as Exhibit 1.

Dated February 5, 2010

Respectfully submitted,

VINSON & ELKINS L.L.P.

/s/ Tonya Moffat Ramsey

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**SPECIAL COUNSEL FOR NATIONAL
ENERGY GAS TRANSMISSION, INC.**

CERTIFICATE OF SERVICE

I hereby certify that, on February 5, 2010, a copy of the foregoing pleading was (i) filed with the Court for the United States Bankruptcy Court of the District of Maryland by using the CM/ECF system; (ii) served electronically by the Court's CM/ECF system on all parties registered to receive electronic noticing in this case; and (iii) served by first class U.S. mail, postage prepaid, to counsel for ET Power.

/s/ Tonya M. Ramsey
One of Counsel

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