



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

June 1, 2021

Saul Laureles  
Chief Legal Officer  
STEM, INC.  
100 Rollins Rd.  
Milbrae, CA 94030

**Re: STEM, INC.**  
**Form S-1**  
**Filed May 26, 2021**  
**File No. 333-256501**

Dear Mr. Laureles:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Mindy Hooker at 202-551-3732 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Manufacturing