



DIVISION OF  
CORPORATION FINANCE

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

July 22, 2021

William Bush  
Chief Financial Officer  
STEM, INC.  
100 California Street  
San Francisco, CA 94111

**Re: STEM, INC.**  
**Registration Statement on Form S-1**  
**Filed July 19, 2021**  
**File No. 333-257994**

Dear Mr. Bush:

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 SiSi Cheng at 202-551-5004 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Manufacturing

cc: John T. Gaffney, Esq.