



DIVISION OF
CORPORATION FINANCE

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

June 23, 2022

Saul Laureles
Chief Legal Officer
Stem, Inc.
100 California St., 14th Floor
San Francisco, California 94111

Re: Stem, Inc.
Registration Statement on Form S-3
Filed June 15, 2022
File No. 333-265612

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 Gregory Herbers at 202-551-8028 with any questions.

Sincerely,

Division of Corporation Finance
Office of Manufacturing

cc: John T. Gaffney