

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

April 10, 2020

Benjamin M. Locke Chief Executive Officer Tecogen Inc. 45 First Avenue Waltham, MA 02451

Re: Tecogen Inc.

Registration Statement on Form S-3

Filed April 6, 2020 File No. 333-237582

Dear Mr. Locke:

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

Please refer to Rule 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 Bernard Nolan, Attorney-Adviser, at (202) 551-6515 or, in his absence, Jan Woo, Legal Branch Chief, at (202) 551-3453 with any questions.

Sincerely,

Division of Corporation Finance Office of Technology

cc: Neil R.E. Carr