

May 20, 2022

Tyson Hottinger
General Counsel
Array Technologies, Inc.
3901 Midway Place NE
Albuquerque, New Mexico 87109

Inc.

13, 2022

Re: Array Technologies,

CIK 0001820721
Form S-1 Filed May

File No. 333-264950

Dear Mr. Hottinger:

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 Alex

King at 202-551-8631 with any questions.

Sincerely,

Division of Corporation Finance

Office of Manufacturing

cc:

Michael Kim