November 25, 2020

George H. Kirby, III Chief Executive Officer Ocean Power Technologies, Inc. 28 Engelhard Drive, Suite B Monroe Township, New Jersey 08831

Technologies, Inc.

2020

Statement on Form S-3

Re: Ocean Power

Registration

Please contact Kevin

Filed November 20, File No. 333-250824

Dear Mr. Kirby:

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.

Dougherty at (202) 551-3271 with any questions.

Sincerely,

Division of Corporation Finance Office of Energy & Transportation cc: Kevin J. Poli