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November 3, 2015

U.S. Securities and Exchange Commission  
Division of Investment Management  
Attention: Mr. James E. O'Connor, Senior Counsel  
100 F Street, NE  
Washington, DC 20549

**Re: Pre-Effective Amendment No. 2 to the Registration Statement on Form N-2 (File No. 333-203511) filed by Hercules Technology Growth Capital, Inc. on September 29, 2015**

Dear Mr. O'Connor:

On behalf of Hercules Technology Growth Capital, Inc. (the "**Fund**"), set forth below is the Fund's response to the oral comment provided by the staff of the Division of Investment Management (the "**Staff**") of the Securities and Exchange Commission (the "**SEC**") to the Fund on October 30, 2015 regarding Pre-Effective Amendment No. 2 to the Fund's Registration Statement and the prospectus contain therein. The Staff's comment is set forth below in italics and is followed by the Fund's responses.

**Comment:** *The Staff requests that the Fund confirm and represent to the Staff that it believes that its assets will provide adequate cover to satisfy all of its unfunded commitments.*

**Response:** In response to the Staff's comment, the Fund confirms and represents to the Staff that it believes that its assets will provide adequate cover to satisfy its unfunded commitments.

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U.S. Securities and Exchange Commission  
Attention: Mr. James O'Connor, Senior Counsel

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If you have any questions or additional comments concerning the foregoing, please contact me at (202) 383-0218.

Sincerely,

/s/ Cynthia M. Krus

Cynthia M. Krus